

AO 106 (REV 4/10) Affidavit for Search Warrant

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNDER SEAL

Case Number:

16M261 7

In the Matter of the Search of:

The office located at 121 North LaSalle Street, Room
304, Chicago, Illinois, further described in
Attachment A-1

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, Steven D. Noldin, a Special Agent of the Federal Bureau of Investigation, request a search warrant and
state under penalty of perjury that I have reason to believe that on the following property or premises:

See Attachment A-1

located in the Northern District of Illinois, there is now concealed:

See Attachment A-2

The basis for the search under Fed. R. Crim. P. 41(c) is evidence and instrumentalities.

The search is related to a violation of:

Code Section

Title 18, United States Code, Sections 371, 666, 1343,
1346, 1349 and 1951

FILED

MAY 27 2016

MAGISTRATE JUDGE

YOUNG B. KIM
The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.

Offense Description

conspiracy to commit an offense against the United
States; bribery and gratuities concerning programs
receiving federal funds; wire fraud; honest services wire
fraud; conspiracy and attempt to commit wire and
honest services fraud; and extortion, attempted extortion
and conspiracy to commit extortion

Signature

Applicant's Signature

STEVEN D. NOLDIN, Special Agent, Federal Bureau
Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date: May 27, 2016

City and State: Chicago, Illinois

Signature

YOUNG B. KIM, U.S. Magistrate Judge

Printed name and title

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

AFFIDAVIT

I, STEVEN D. NOLDIN, being duly sworn on oath, state as follows:

I. Preliminary Matters

1. I am a Special Agent with the FBI and have been employed by the FBI since June 2008. In connection with my official FBI duties, I have experience investigating violations of federal criminal law, including conspiracy to commit an offense against the United States, in violation of Title 18, United States Code, Section 371; bribery and gratuities concerning programs receiving federal funds, in violation of Title 18, United States Code, Section 666; wire fraud, in violation of Title 18, United States Code, Section 1343; honest services fraud, in violation of Title 18, United States Code, Section 1346; conspiracy and attempt to commit wire and honest services fraud, in violation of Title 18, United States Code, Section 1349; and extortion, attempted extortion and conspiracy to commit extortion, in violation of Title 18, United States Code, Section 1951 (the "**Subject Offenses**"). During my tenure as a Special Agent I have also been involved in various types of electronic surveillance, as well as in the debriefing of defendants, witnesses, informants and others who have knowledge of criminal activities. I have participated in the execution of multiple federal search warrants.
2. This affidavit is made for the purpose of establishing probable cause in support of an application for a warrant to search the following locations (the "**Subject Premises**"):

a. The offices located at 121 North LaSalle Street, Room 304, Chicago, Illinois (hereinafter, "**Subject Location 1**"), which is the City Hall office of Alderman DANIEL SOLIS, which is further described in Attachment A-1;

b. The office located at 1645 South Blue Island Avenue, Chicago, Illinois (hereinafter, "**Subject Location 2**"), which is the 25th Ward office for Alderman DANIEL SOLIS and the location of Citizens for Danny Solis and the 25th Ward Regular Democratic Organization, which is further described in Attachment B-1;

c. The residence located at 800 South Wells Street, Unit 522, Chicago, Illinois (hereinafter, "**Subject Location 3**"), which is SOLIS's residence, which is further described in Attachment C-1;

d. The residence located at 1135 South Delano Court, Unit 812 East, Chicago, Illinois (hereinafter, "**Subject Location 4**"), which is a residence used by SOLIS, SOLIS's wife, and SOLIS's son, which is further described in Attachment D-1;

e. The business known as "Copper Tan and Spa," located at 1052 N. Milwaukee Avenue, Chicago, Illinois (hereinafter, "**Subject Location 5**"), which is further described in Attachment E-1;

f. The cellular telephone bearing the number (312) 208-0292, International Mobile Subscriber Identity Number ("IMSI") 310410840352309, a cellular telephone on the system operated by the service provider AT&T, subscribed to "Daniel Solis, 6148 Rob Roy Dr., Oak Forest, IL 60452," and used by DANIEL SOLIS hereinafter, "**Target Phone 2**"), which is further described in Attachment F-1.

3. As set forth below, there is probable cause to believe that the **Subject Premises** contain evidence and instrumentalities of violations of the **Subject Offenses**. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence and instrumentalities of violations of the **Subject Offenses** are located within the **Subject Premises**.

4. Reference is made to lawfully recorded conversations in this affidavit. In certain instances, these conversations are summarized and placed in context. My understanding of these conversations (which often appears in brackets) is aided by the content and context of the conversations, my review of other recorded conversations, information provided by a cooperating individual, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. The times listed for the recorded conversations are approximate. Further, summaries of the recorded conversations herein do not represent finalized

transcripts and may not represent the entire conversation that occurred between the identified individuals.

II. Summary of Probable Cause

5. DANIEL SOLIS, an Alderman for the City of Chicago, is the subject of an investigation being conducted by the Federal Bureau of Investigation ("FBI"). As described in greater detail herein, there is reasonable cause to believe that SOLIS and others have committed the **Subject Offenses** by engaging in a series of transactions that involve the abuse of SOLIS's position as a public official.

6. In particular, SOLIS has agreed to use and used his position as a public official to obtain private benefits for himself and for others, in violation of 18 U.S.C. § 1951. SOLIS has received a flow of private benefits from individuals for whom SOLIS offered to take, has taken or will likely take official action, in violation of 18 U.S.C. §§ 1343, 1346, and 1349. Additionally, SOLIS has solicited, accepted, and agreed to accept private benefits and campaign contributions intending to be influenced and rewarded in connection with his official acts, in violation of 18 U.S.C. § 666.

7. In this paragraph, and in paragraphs 8 and 9, I am offering my interpretation of the evidence that is further described in the rest of this affidavit. As detailed below, SOLIS has agreed to take action in his official capacity as an Alderman for private benefits directed to MICHAEL MADIGAN. Specifically, a cooperating individual has assisted a businessman, Businessman 1, in his efforts

to have the zoning of a piece of property located in Chicago changed so that a hotel could be built on the property. SOLIS assured the cooperating individual that, in return for Businessman 1 retaining MADIGAN's personal law firm on tax matters, Businessman 1 would receive "anything" he needed in connection with the hotel development project. After SOLIS was advised of Businessman 1's agreement to hire MADIGAN's firm, SOLIS provided a letter of support for rezoning of the property to be used for the hotel development project. See pages 11 through 29.

8. There is reasonable cause to believe that SOLIS has received a steady flow of personal benefits from various individuals for whom SOLIS (i) has taken official action, (ii) has offered to take official action or (iii) is likely to take official action in the future, including the following:

a. ROBERTO CALDERO. CALDERO has provided SOLIS with a stream of benefits, to include Viagra, arranging for prostitution services for SOLIS, and securing campaign contributions from relatives of Elgin Sweeping, a company CALDERO represented, in efforts to obtain an exemption from the City's water ordinance. In return for these benefits, SOLIS assisted CALDERO in obtaining the requested exemption for Elgin Sweeping.

b. FREDERICK LATSKO. LATSKO has provided SOLIS with the use of a multi-million dollar farm so that SOLIS could hold a graduation party for his son. LATSKO also agreed to lease a dance studio property at SOLIS's direction so SOLIS could take economic revenge on his daughter's former business partners. SOLIS for his part has taken steps to propose a city ordinance favorable to LATSKO's business interests, and has participated in the approval of multiple projects involving LATSKO.

9. There is reasonable cause to believe that SOLIS has actively solicited monetary contributions in telephone calls, and these solicitations have repeatedly coincided with SOLIS's promises

in these very same calls to take official action benefitting the contributors, who have official business with the City.

a. For example, SOLIS has solicited monetary contributions from VICTOR REYES, and has explicitly promised that in return for monetary donations arranged by REYES, SOLIS will steer legal business to REYES. See pages 81 through 83. Moreover, a review of financial records reflects that, while such contributions are represented to be campaign contributions, at times SOLIS uses funds derived from contributions for his own personal use, including the payment of school tuition for his son.

b. SOLIS also agreed with JUAN GAYTAN to accept a gratuity from McHugh Construction that was given as a reward for SOLIS's official acts favoring McHugh Construction in connection with the company's efforts to obtain approval of a 500-room hotel and data center project. On September 29, 2014, two days after GAYTAN told SOLIS that McHugh Construction wanted to back SOLIS "big time" because they were tired of the "B.S." (that is, delays to the approval of their project), and on the very same day that (i) GAYTAN advised SOLIS that GAYTAN would make McHugh Construction think SOLIS was helping out McHugh Construction "all the way" concerning their project, and (ii) SOLIS told GAYTAN to tell a representative from McHugh Construction that SOLIS would be prepared to call a special meeting to approve the project, McHugh Construction made a \$1,500 contribution to Citizens for Danny Solis.

c. SOLIS assisted Elgin Sweeping in an attempt to obtain an exemption from a water ordinance that would have required Elgin Sweeping to pay a significant amount of revenue to the City of Chicago. After SOLIS rendered this assistance, he told Elgin Sweeping's representative, CALDERO, that he hoped the president of Elgin Sweeping would "remember" SOLIS's assistance, and then discussed how much money CALDERO would raise from the president of Elgin Sweeping and his family members. SOLIS subsequently received a \$5,400 contribution from the family's real estate company.

10. There is reasonable cause to believe that the **Subject Premises** will contain evidence concerning the commission of the **Subject Offenses**. See pages 116 through 131. By way of example, there is reasonable cause to believe that (i) **Subject Location 1**, SOLIS's office at City Hall, will contain documents relating to development projects where SOLIS has taken official action in return

for illicit private benefits; (ii) **Subject Location 2**, SOLIS's 25th Ward constituent office, will contain records relating to monetary contributions solicited by SOLIS, including details of money received, the identity of contributors, and the timing and receipt of such contributions, as well as records of expenses incurred by the 25th Ward Regular Democratic Organization, which will constitute proof of what are permissible expenditures as opposed to expenditures made by SOLIS to satisfy his personal expenses; (iii) **Subject Location 3**, SOLIS's residence, will contain records of his personal expenditures, which would constitute evidence that SOLIS has not paid for benefits lavished on him by others and that he has used funds from the 25th Ward Regular Democratic Organization to pay for such expenses; (iv) **Subject Location 4**, a residence used by SOLIS, his wife, and his son, will also contain records of his personal expenditures, which would constitute evidence that SOLIS has not paid for personal benefits and that he has used funds from the 25th Ward Regular Democratic Organization to pay for such expenses; (v) **Subject Location 5**, a massage parlor where SOLIS received prostitution services for which CALDERO may have paid, will contain records relating to payments for the prostitution and other services received by SOLIS; and (vi) **Target Phone 2**, SOLIS's cellular telephone, will contain evidence concerning SOLIS's use of the facility and communication with others concerning the **Subject Offenses**.

III. Facts Establishing Probable Cause

11. According to public records, the City of Chicago is a municipal corporation and municipal subdivision of the State of Illinois. According to the website www.USAspending.gov, the City received more than \$10,000 in federal funds in fiscal years 2014 and 2015.

12. The City's legislative branch is the City Council, which is comprised of approximately fifty aldermen, each of whom represents one legislative district or "ward." Aldermen are compensated and publicly-elected. The City Council has the authority to set policy and pass ordinances and resolutions related to the responsibilities of City government, including approving zoning regulations.

13. Aldermen are assisted in their official duties by staff members, who are paid City employees.

14. Aldermen have offices within City Hall, which is located at 121 North LaSalle Street in Chicago, as well as offices within their wards.

15. According to public records, DANIEL SOLIS is the Alderman for the 25th Ward and a member of Chicago's City Council. Information gathered during the course of this investigation (including official correspondence from SOLIS and a consensual recording of SOLIS) reflects that SOLIS is the Chairman of the City Council's Zoning, Landmarks & Building Standards Committee. The responsibilities of

this committee include approving changes to the zoning of real property within the City of Chicago.

16. In his Statement of Financial Interests filed with the City of Chicago on or about May 12, 2015, SOLIS answered "no" to the question, "In 2014, did you receive from any person (other than relatives or a domestic partner) one or more gifts having an aggregate value in excess of \$250?" In his Statement of Economic Interests filed with the Cook County Clerk on or about May 1, 2015, SOLIS answered "N/A" in response to the following question: "List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500, was received during the preceding calendar year."

17. In his Statement of Financial Interests filed with the City of Chicago on or about May 2, 2016, SOLIS answered "no" to the following question: "In 2015, did you receive from any person (other than relatives or a domestic partner) one or more gifts having an aggregate value in excess of \$250?" In his Statement of Economic Interests filed with the Cook County Clerk on or about May 2, 2016, SOLIS answered "N/A" in response to the following question: "List the names of any entity from which a gift or gifts, or honorarium or honoraria, valued singly or in the aggregate in excess of \$500, was received during the preceding calendar year."

18. According to publicly available information, a Statement of Financial Interest for the City of Chicago may be filed online or in-person; Cook County Statements of Financial Interest are filed

online. Based on a review of SOLIS's City and Cook County Statements of Financial Interest, they appear to have been filed electronically.

A. SOLIS's Efforts to Obtain Private Business for the Benefit of MADIGAN, and SOLIS's Illicit Promise to Take Official Action in Return for Business Steered to MADIGAN.

19. In or around May 2014, a cooperating individual ("CS-1") began providing information to the FBI. CS-1 has historical involvement in a variety of real estate investment and development projects in the Chicago area, and as a result of this activity has had contact with SOLIS.

20. CS-1 has been advised that CS-1 will be charged for his participation in a fraudulent scheme that included CS-1's material false representations to a financial institution and purchasers of real property, and misappropriation of funds obtained from purchasers through false representations made by CS-1. On May 1, 2014, CS-1 received a proffer letter from the U.S. Attorney's Office. CS-1 is cooperating in hopes of receiving a reduced sentence in connection with this future charge. While CS-1 understands the United States may recommend to CS-1's sentencing judge a reduced sentence on these charges, no promises have been made to CS-1 as to what CS-1's sentence will be or what recommendation the United States will make at sentencing. CS-1, who was the director of a financial institution, was investigated by the FDIC for alleged structuring of cash deposits at a financial institution over the course of several years. Civil charges seeking his removal and prohibition

from the banking industry were not brought due to evidentiary concerns and statute of limitations issues. CS-1 has previously provided information to law enforcement and has been determined to be reliable. Information provided by CS-1 in connection with this investigation has been corroborated by the information provided in this affidavit, including the consensual recordings referenced herein.

21. In or around May 2014, CS-1 advised the FBI that CS-1 represented Businessman 1, a Chinese businessman and property developer, in his efforts to have the zoning of a piece of land located at 2020 South Archer in Chicago, Illinois (the "Hotel Property"), changed so that a hotel could be built on the Hotel Property.¹

22. When interviewed in or around May 2014 and June 2014, CS-1 stated that approximately two to three months earlier, CS-1 had met with SOLIS in an attempt to obtain a letter of support from SOLIS for a change in the zoning of the Hotel Property. CS-1 reported that, after this meeting, CS-1 believed that SOLIS would provide a letter of support for the zoning change. SOLIS had specified that he would support the rezoning if two conditions were met: (1) the parcel of land adjacent to the Hotel Property was not used to build another

¹ CS-1 explained that in order to finance the construction of the hotel, Businessman 1 planned to sell off real estate abroad and then send the proceeds to the United States, and that if these proceeds were not sufficient, Businessman 1 would attempt to take out a loan with a U.S. bank. CS-1 advised that Businessman 1 planned for the hotel to cater, in part, to tourists and businessmen traveling from abroad. Accordingly, I believe the planned construction of the hotel would have resulted in the movement of currency and people in commerce.

hotel, and (2) Businessman 1 provided letters of support from the community supporting the proposed rezoning. However, CS-1 stated that after the meeting, SOLIS did not communicate with CS-1 about SOLIS's decision to support the proposed zoning change. CS-1 believed SOLIS was purposely trying to avoid CS-1. CS-1 stated that approximately two to three weeks earlier (within the April 2014 to May 2014 timeframe), CS-1 attended a fundraiser for SOLIS. Businessman 1 requested that CS-1 donate \$2,500 to SOLIS at this fundraiser on Businessman 1's behalf, and CS-1 did so. According to CS-1, SOLIS began communicating with CS-1 again after the donation.²

23. CS-1 stated that CS-1 provided multiple letters of support to SOLIS concerning the rezoning of the Hotel Property from various neighborhood organizations.

24. CS-1 advised that on or about July 21, 2014, CS-1 met with SOLIS at **Subject Location 1** regarding the proposed zoning change for the Hotel Property. Also present were Businessman 1; a legislative aide and scheduler for SOLIS; and an attorney representing Businessman 1 in connection with the rezoning of the property. This meeting was not recorded. CS-1 advised that during this meeting, SOLIS stated that he wanted all of the letters of support from the community in favor of the zoning change, and that two letters were missing: one from the Chinatown Chamber of Commerce and another from

² A review of Illinois State Board of Elections records revealed a \$2,500 contribution on or about April 8, 2014, to the 25th Ward Regular Democratic Organization in the name of a limited liability company associated with Businessman 1 and the Hotel Project.

the Chinese American Service League. CS-1 advised SOLIS that these letters would be provided in the coming days.

25. CS-1 advised that SOLIS had told CS-1 that the most important letter of support to receive was from the Chinatown Chamber of Commerce. CS-1 provided an email that CS-1 received from the Chinatown Chamber of Commerce that reflected that SOLIS was sent a letter of support from the Chinatown Chamber of Commerce on August 1, 2014. CS-1 also received an electronic copy of this letter on August 1, 2014, and has provided a copy of this letter to law enforcement. CS-1 advised that CS-1 received the Chinese American Service League's letter of support on August 8, 2014, and then immediately forwarded this letter to the attorney representing Businessman 1.

26. CS-1 advised law enforcement that on or about August 5, 2014, CS-1 received a telephone call from SOLIS's legislative aide. At the time this call was received, records maintained by the City of Chicago reflect that an application for an amendment to the Chicago zoning ordinance to allow the construction of the hotel had been filed. The aide instructed CS-1 to call SOLIS as soon as possible. CS-1 advised that he placed a return call to SOLIS. This call was not recorded.³ During this call, SOLIS asked CS-1 if CS-1 knew who MADIGAN was. CS-1 responded that CS-1 knew who MADIGAN was.

³ CS-1 had been instructed not to have unrecorded contact with SOLIS without first consulting with law enforcement agents. CS-1 explained that because CS-1 had been asked to call back SOLIS as soon as possible, it was best to call immediately, otherwise the Alderman might not provide his support.

SOLIS stated that he (SOLIS) wanted to arrange a meeting between CS-1, Businessman 1, MADIGAN and himself. CS-1 agreed and stated CS-1 would have to translate for Businessman 1 because Businessman 1 did not speak English. SOLIS told CS-1 that he (SOLIS) would contact CS-1 in a couple of days to arrange the meeting. SOLIS did not specify what the purpose of the meeting was.

27. On or about August 6, 2014, CS-1 received an email from SOLIS's legislative aide that was addressed to CS-1's "Gmail" account.⁴ CS-1 provided a copy of the email to law enforcement. The aide sent the email from a City of Chicago email account. The subject of the email was: "Meeting w/Alderman Daniel Solis & Speaker Madigan." The aide wrote: "Dear [CS-1], The Alderman has asked me to schedule a meeting with yourself, [Businessman 1] and Speaker Michael Madigan. Please let me know asap what your availability is like for August 18th, 19th, 21st and 22nd, after 11:00 a.m." No explanation was provided in the email as to the purpose of the meeting. Furthermore, CS-1 advised law enforcement that he had not been advised as to the purpose of the meeting with SOLIS and MADIGAN. In a follow-up email sent by the aide later that day, she advised the meeting would take place on August 18, 2014, and specified the

4 Gmail is an email service offered by Google. A representative of Google, Inc. who routinely addresses law enforcement requests for information concerning Google's operations is not familiar with the existence of any communications infrastructure operated by Google within the State of Illinois for the period from August 1, 2014 to September 22, 2014. Accordingly, I have reason to believe that the delivery of the email to CS-1 (who is located within Illinois) via CS-1's Gmail account required the use of the channels of interstate commerce. Based on this, I believe SOLIS caused the use of the channels of interstate commerce in order to carry out this offense.

location of the meeting, which was 30 North LaSalle Street, Room 3906. A review of publicly available information reflects that MADIGAN is a partner in Madigan & Getzendanner, a law firm that maintains an office at this location.

i. **Consensually Recorded Meeting Between CS-1, SOLIS, MADIGAN and Others.**

28. On August 18, 2014, at approximately 11:57 a.m., CS-1 attended a meeting within a conference room at MADIGAN's law firm office. CS-1 made a consensual video and audio recording of this meeting. Initially, the following individuals were present at the meeting: CS-1, Businessman 1, MADIGAN, and MADIGAN's law firm partner.

29. During the meeting, CS-1 explained that Businessman 1 was "trying to do a hotel in Chinatown right now." MADIGAN replied: "Good, good." CS-1 acted as a translator for Businessman 1 during the conversation. CS-1 further explained to MADIGAN and his law firm partner that Businessman 1 was a big developer in China, and explained that Businessman 1 owned two hotels in China.

30. Thereafter, SOLIS, and another two individuals on SOLIS's staff joined the meeting.

31. During the meeting, CS-1 explained that Businessman 1 saw an opportunity because "real estate" was "bouncing back," and that Businessman 1 "wants to do the hotel in Chinatown." CS-1 explained that Businessman 1 was looking for more "opportunity in future [business opportunities]" MADIGAN replied: "Good. Very good, very good," and expressed his belief that there was a lot of

Chinese investment coming into the United States. CS-1 thereafter discussed a commercial project and Businessman 1's interest in a real estate development project in the Chinatown community.

32. Shortly thereafter, MADIGAN said: "Well, our interest would be that we represent buildings like that on the real estate taxes. . . . And we do quite a few hotels. And, uh, we have a little different approach to representation on hotels than the other law firms that do the work" MADIGAN said that his partner could provide an explanation. Thereafter, MADIGAN's partner explained the law firm's representation of hotels on tax matters.

33. CS-1 explained that "the hotel that he's [Businessman 1] proposing in Chinatown, is about 6 million dollars, hopefully we get support from the Alderman [SOLIS] to get the zoning change," and then asked how much tax this hotel would be subject to and how much in taxes could be saved by hiring a good law firm. I understand CS-1 to be telling those in the meeting, including SOLIS, that a zoning change was required for the hotel project to go forward. Based on the information provided by CS-1, a zoning change was required to carry out the hotel development project.

34. MADIGAN's partner then discussed the potential taxes owed from the operation of the hotel, and then departed the room to get materials that would assist him in calculating potential taxes on the hotel.

35. As MADIGAN's partner departed the room, CS-1 said: "[Businessman 1], he just want to use this opportunity to meet, uh,

Mr. Madigan and Alderman, and he is very interested in the Chinatown parking lots project." CS-1 showed SOLIS and MADIGAN a site map of a proposed commercial development project in the Chinatown area, which was distinct and separate from the Hotel Property that CS-1 was attempting to have rezoned. MADIGAN asked for the identification of various landmarks on the site map. CS-1 said that Businessman 1 "wants to know if there is any opportunity, uh, he can work with the State and the City to, to get a nice project, uh, commercial project in Chinatown." SOLIS responded: "Okay." CS-1 noted that Businessman 1 had a lot of resources in China to back him up. MADIGAN replied: "Uh-hmm, uh-hmm." SOLIS explained to MADIGAN the relationship of the property in question to a larger development project. SOLIS also explained to MADIGAN that the plan with the parking project was to "replace the parking and add to it," and to build "both residential and commercial on it [the property]." SOLIS noted that "it's [the real estate] gonna be open to . . . proposals . . .," and MADIGAN responded: "Uh-hmm, uh-hmm, uh-hmm, okay." MADIGAN asked: "Is this owned by the State?" I understand MADIGAN to be asking whether certain property involved in the potential parking lot project was owned by the State of Illinois. SOLIS replied: "The parking lot yes." MADIGAN then asked about a parcel of "vacant land." SOLIS explained there was a small parcel "east of the CTA" that was "owned by the City." Thereafter, MADIGAN, SOLIS and SOLIS's staff member discussed who owned the property involved in the potential parking lot transaction.

36. CS-1 asked what the timing would be for Businessman 1 to present a proposal for the development of the land in question: "What's the right, the right timing, can he do something, do a proposal now, and submit it to the City?" SOLIS explained that it was "still early stages," but that if Businessman 1 had a proposal "he should bring it up, but it wouldn't be an official" CS-1 said: "Okay." MADIGAN added: "Okay."

37. Then, MADIGAN's partner, who had by this time returned to the conference room, continued to discuss the taxes that would be levied on the hotel.

38. CS-1 asked what the charge would be for hiring MADIGAN's firm. MADIGAN's partner explained that the fee would be 12 1/2% of any tax savings generated by the firm, or a fixed fee of approximately \$3,000 to \$3,500 a year. SOLIS added: "There is no better firm than this firm in terms of doing real estate taxes in the State."

39. CS-1 said: "First of all, [Businessman 1] wants to know, there's any, uhm, cause he, he, he's in business. He's in Chicago, he wants to do business. Any other opportunities open, like, like, maybe for him?" CS-1 suggested "real estate deals, any deals." SOLIS replied that there were a lot of opportunities in Chinatown. SOLIS added: "And uhm, I think that there's, just general growth across the City, uhm, I can see that in my committee right now, as Chairman of Zoning, and I can see it, if you go look out in terms of the number of cranes that are working, so I would be happy to sit down and talk."

40. MADIGAN thereafter asked about the "status of the representation of this hotel we're talking about." MADIGAN asked whether Businessman 1 was "committed to other people," and CS-1 replied: "Not yet." MADIGAN confirmed that his firm was "under consideration." MADIGAN then discussed options concerning the fee payment structure. MADIGAN added: "We're not interested in a quick killing here. We're interested in a long-term relationship." MADIGAN thereafter indicated his belief that his firm provided quality representation.

41. The meeting then concluded. At the conclusion of the meeting, SOLIS asked MADIGAN if he had "a couple of minutes," and MADIGAN replied: "Oh yeah, sure." After CS-1 took photographs of Businessman 1 posing with SOLIS and MADIGAN, SOLIS began telling MADIGAN that he had found a video of a meeting "we" had. CS-1 asked SOLIS if CS-1 and Businessman 1 should "wait outside" for SOLIS. SOLIS responded: "Yeah." MADIGAN told CS-1 and Businessman 1: "If you could wait, why don't you wait in here." MADIGAN then directed CS-1 and Businessman 1 to another room in the office. SOLIS and MADIGAN rejoined CS-1 and Businessman 1 approximately four minutes later. MADIGAN escorted SOLIS, CS-1 and Businessman 1 out of the office. SOLIS, CS-1 and Businessman 1 departed the office together.

42. Immediately after leaving the office space, CS-1 said to SOLIS: "Alderman, uh, you know [Businessman 1], that, uh, I, he, he love to, uh, uh, give the business to, uh, Mr. Speaker, but you know, like, without your support, that hotel, you know, zoning change is

very critical, you know like, without, we have to go through zoning change- " SOLIS replied: "Well, if he works with the Speaker, he will get anything he needs for that hotel." I understand SOLIS to be telling CS-1 that if Businessman 1 hires MADIGAN as his private attorney for future tax matters relating to the planned hotel, SOLIS will take any official action needed to benefit Businessman 1 with respect to the proposed hotel, including but not limited to SOLIS's official support as the Chairman of the City Council's Zoning, Landmarks & Building Standards Committee of any zoning change for the land the hotel will be built on. CS-1 replied: "Okay, thank you." SOLIS added: "And he's going to benefit from being with the Speaker . . . okay?" CS-1 thanked SOLIS. I understand SOLIS to mean that by hiring MADIGAN's private firm, Businessman 1 would ensure that SOLIS and MADIGAN would take official action benefitting Businessman 1 in their capacity as public officials.

43. After being promised by SOLIS that Businessman 1 would receive "anything" he needed for the hotel in return for hiring MADIGAN, CS-1 told SOLIS with respect to a "fundraiser on the 4th,"⁵ Businessman 1 had "sent in money to be a vice chair," and that CS-1 would "go on his behalf to the fundraiser." SOLIS replied: "Thank you . . . Okay, very good, very good." CS-1 added: "He wants to do

5 CS-1 advised law enforcement that SOLIS scheduled a fundraiser for September 10, 2014. CS-1 attended this fundraiser and consensually recorded his attendance at the fundraiser at the instruction of law enforcement. CS-1 provided a donation of \$2,500 (in the form of a check written by Businessman 1) at the SOLIS fundraiser. Based on this, I believe CS-1 misspoke when he referenced the fundraiser being on the 4th.

it long term." SOLIS replied: "So do I, so do I." Shortly thereafter, CS-1 said: "Hopefully, he can break ground this year." [I believe CS-1 expressed hope that Businessman 1 could begin building the hotel this year.] SOLIS replied: "Yeah. I will do whatever I can to speed up the process and get everything he needs to begin, uh, breaking ground, alright?" [I understand SOLIS to mean that he would take whatever official action he was able to ensure that construction of the hotel could begin promptly.] SOLIS added: "This is important. Very important." [My understanding is that SOLIS indicated that it was "very important" for Businessman 1 to hire MADIGAN to ensure official action would be taken for Businessman 1's benefit.] CS-1 replied: "Okay, yes. Yes. So I will make sure [Businessman 1] will give him the business." SOLIS replied: "Good. Good."

ii. CS-1 Contacts SOLIS to Discuss the Retention of MADIGAN's Law Firm.

44. On August 21, 2014, at approximately 1:15 p.m., CS-1 placed a call to SOLIS. This call was lawfully recorded. During this call, CS-1 advised SOLIS that Businessman 1 had agreed to hire MADIGAN's law firm. Specifically, CS-1 told SOLIS that Businessman 1 had told CS-1 to call SOLIS and thank SOLIS for arranging a meeting for Businessman 1 with MADIGAN. CS-1 added: "And also, he [Businessman 1] has, he has decided to uh, use, uh his [MADIGAN's] law firm for his . . . tax service" CS-1 asked if he should contact MADIGAN or his partner. SOLIS told CS-1: "You can contact him, uhm, ah, and I'll call him too, and let him know you will be

calling him." CS-1 explained that "because it's a long term relationship, uh, probably [Businessman 1] want to do it with him like a multi-year like, uh, uh, uh, like, engagement, something like that" SOLIS replied: "Good, good, good." CS-1 then said that Businessman 1 had reminded CS-1 about SOLIS's "letter of support for his zoning change, because the zoning change is coming up on the September 4," and CS-1 asked: "Can he get the letter from you before that . . . date?" SOLIS told CS-1 to call his legislative aide and "tell her to get it ready." SOLIS then asked CS-1 to locate "anybody else in the network of people you know that uhm, would like to participate in my, uhm, fundraising event September 10, let me know." CS-1 agreed to look for more people "to support this event." I believe that SOLIS was attempting to further use his agreement to provide a letter of support as a means of extorting additional financial benefits from CS-1.

iii. SOLIS Provides a Letter Supporting a Zoning Change for the Hotel Property and Speaks in Favor of the Zoning Change for the Hotel Property at a Zoning Committee Hearing.

45. In connection with this investigation, CS-1 has provided law enforcement with email correspondence concerning the zoning change for the Hotel Property. On or about August 21, 2014, an attorney for Businessman 1 sent an email to SOLIS's legislative aide, forwarding an application for an amendment of the Chicago zoning ordinance that sought to rezone the Hotel Property.

46. On or about Friday, August 22, 2014, the aide replied to this email: "Please prepare a draft of the letter of support from the Alderman."

47. On or about August 29, 2014, CS-1 provided law enforcement with a copy of an email he had received from SOLIS's aide via CS-1's Gmail account. Attached to the email was a signed letter of support from SOLIS, supporting the requested zoning change to the Hotel Property. Specifically, the letter, which was on SOLIS's official City Council letterhead, was dated August 26, 2014, and addressed to Patti Scudiero, the Zoning Administrator, Bureau of Planning and Zoning. The letter carried a subject line referring to the Hotel Property, and provided as follows:

I am writing to pledge my support for the zoning change of the aforementioned address.

The applicant . . . proposes to develop the subject property to a new multi-storey [sic] building consisting of a hotel with retail and offices on the ground floor. To accomplish this, the applicant will require a zoning change from a current C3-3 Commercial, Manufacturing and Employment Zoning to a C3-5 Commercial, Manufacturing and Employment Zoning District.

Please feel free to contact [name redacted], Legislative Aide and Scheduler, at my office on (773) 744-6845 if you have any questions or require further information. Thank you for your time and attention.

Respectfully,

/s/ Daniel Solis
Daniel Solis

Alderman, 25th Ward

Chairman, Committee on Zoning, Landmarks and
Building Standards

48. CS-1 attended a hearing held by the City Council's Committee on Zoning, Landmarks and Building Standards in or around September 2014. CS-1 consensually recorded the hearing. SOLIS presided over the hearing. During the hearing, Businessman 1's attorney presented the proposed change to the zoning of the Hotel Property, and asked for support of the proposed change. SOLIS replied: "I do give my support. I do give my support." SOLIS explained that he was giving his support because the population in Chinatown was "exploding" and there was a need for a place where Chinese could feel "comfortable" within walking distance of Chinatown. SOLIS noted another committee member supported the zoning change, and during his remarks, SOLIS also asked for the support of the rest of the committee for the proposed zoning change. During his remarks at the hearing, SOLIS did not reference his promise to give CS-1 "anything" he needed for the hotel in return for business steered to MADIGAN. The committee approved the proposed change to the zoning of the Hotel Property.

49. In September 2014, CS-1 placed additional consensually-recorded calls to MADIGAN at MADIGAN's law firm. For example, on September 15, 2014, at approximately 10:12 a.m., CS-1 placed an outgoing call to MADIGAN, who was using telephone number (773) 581-8000. Based on publicly available information, (773) 581-8000 is the telephone number for MADIGAN's Illinois General Assembly District Office. During the call, CS-1 spoke to MADIGAN

about arranging a time to meet with MADIGAN about the retention of MADIGAN's firm. Specifically, CS-1 advised MADIGAN that Businessman 1 wanted CS-1 to meet with MADIGAN to "go over the contract," which I understand to refer to the agreement to retain MADIGAN's firm. MADIGAN replied that CS-1 had called and left a message, but that MADIGAN had gotten the "wrong telephone number." Thereafter, CS-1 provided his cell phone number to MADIGAN, and MADIGAN confirmed that he had the wrong number for CS-1. MADIGAN asked if he could call back CS-1 and set up a time for CS-1 to come in and meet with MADIGAN. MADIGAN added: "I think what you want to do is to come in and sit down, and we'll, um, we'll, we'll, we'll agree that we're going to represent the property [the Hotel Property]."

50. On September 15, 2014, at approximately 10:19 a.m., CS-1 placed an outgoing call to SOLIS, who was using **Target Phone 2**. This call was recorded. During the call, CS-1 updated SOLIS on his contact with MADIGAN. Specifically, CS-1 advised SOLIS that he had spoken to "Mr. Speaker [MADIGAN]" and that "he would call me back and to set up a time with me so I can go over the contract with him." SOLIS replied: "Excellent. Excellent. Very, very good. Thank you."

51. CS-1 placed additional follow-up calls to MADIGAN's office. Despite the calls, neither CS-1 nor Businessman 1 has yet signed a retention agreement with MADIGAN's law firm.

- B. SOLIS Has Received A Flow Of Benefits From Individuals For Whom SOLIS, In His Capacity As An Elected Official, (I) Has Taken Official Action, (II) Has Offered To Take Official Action Or (III) Is Likely To Take Official Action Benefitting These Individuals And Their Clients.

52. Interceptions conducted over **Target Phone 2** confirm that SOLIS has poor credit and multiple unpaid debts.⁶ For example, on or about May 28, 2015, at approximately 10:19 a.m. (Session #12019), SOLIS received an incoming call from Byline Bank. During the call, although SOLIS claimed he had done pretty well financially in the past several years, he explained that he experienced a foreclosure on a home three years earlier. As another example, on or about April 16, 2015, at approximately 11:41 a.m. (Session #9021), SOLIS received an incoming call on **Target Phone 2** from Monterrey Collection Services. During the call, SOLIS was advised that he owed \$12,274.36 in fees for a time share contract that had been turned over for collection. SOLIS advised that he was "out of a job so I'm sorry." SOLIS was asked for information concerning the delinquency, and SOLIS replied: "because I can't pay it, I'm sorry." SOLIS then hung up the phone. Multiple other calls from debt collectors seeking payment from SOLIS have been intercepted over **Target Phone 2**.

53. While SOLIS has recently gone through foreclosure proceedings, has received multiple calls from debt collectors, and

⁶ On September 26, 2014, October 27, 2014, December 1, 2014, March 12, 2015, April 10, 2015, May 11, 2015, June 11, 2015, July 23, 2015, and August 21, 2015, the Chief Judge or Acting Chief Judge of the United States District Court for the Northern District of Illinois authorized the interception of wire communications over **Target Phone 2**.

has been unable to readily obtain credit, he has been able to rely upon a collection of associates—including but not limited to ROBERTO CALDERO, and FREDERICK LATSKO—to provide him with a steady flow of personal benefits in 2014 and 2015, and the evidence detailed below reflects that in return, SOLIS, in his capacity as an elected official, (i) has taken official action, (ii) has offered to take official action or (iii) is likely to take official action benefitting these individuals and their clients as summarized in the following chart and as discussed in greater detail below:

<u>Individual</u>	<u>Benefit(s)</u>	<u>Official Action(s)</u>
CALDERO	<ul style="list-style-type: none"> • Viagra (§§ 56-60, 73) • Arrangement of prostitution services (§§ 69-75, 88-89) • Campaign contributions, including contributions from relatives of Elgin Sweeping executive (§§ 78-79, 86-87) 	<ul style="list-style-type: none"> • Assistance with obtaining exemption for Elgin Sweeping from water ordinance (§§ 63-69, 76-86)
LATSKO	<ul style="list-style-type: none"> • Use of multi-million dollar farm (§§ 92-97) • Agreement to lease dance studio property at SOLIS's instruction (§§ 98-108) 	<ul style="list-style-type: none"> • Proposing ordinance favorable to LATSKO (§ 109) • Participating in approval of projects involving LATSKO (§ 113)

54. Furthermore, the investigation to date does not reflect that SOLIS has reimbursed CALDERO or LATSKO for the benefits he has received from them. Despite the absence of any evidence that SOLIS has reimbursed CALDERO or LATSKO for these numerous benefits, SOLIS has filed Statements of Financial Interests and Statements of Economic Interests with both the City of Chicago and the Cook County Clerk, for the years 2014 and 2015, in which he has repeatedly answered "no" to questions asking whether he has received gifts in each year (i) from any person with an aggregate value greater than

\$250; and (ii) from any entity with an aggregate value greater than \$500. Based on the foregoing and the other evidence gathered during the course of this investigation that is discussed in this affidavit, there is reasonable cause to believe that SOLIS has attempted to conceal the considerable benefits he has received from the individuals and that he has taken official action in return for this stream of benefits as detailed below.

- i. **SOLIS's Receipt of Benefits from ROBERTO CALDERO and Official Action on Behalf of CALDERO's Client, Elgin Sweeping, in Obtaining an Exemption from a Water Ordinance.**

55. As described below, conversations intercepted over **Target Phone 2** between SOLIS and ROBERTO CALDERO have shown that CALDERO supplies SOLIS with Viagra on an on-going basis. Moreover, CALDERO has arranged for SOLIS to receive massages at a location where the workers will perform sexual acts upon SOLIS. During the same period, CALDERO requested SOLIS's assistance in his official capacity as a Chicago alderman on a variety of issues, including assistance for his client, a company known as Elgin Sweeping, with respect to a water bill involving the City's Water Department. Shortly after SOLIS interceded in the matter to assist Elgin Sweeping, SOLIS solicited campaign contributions from the president of Elgin Sweeping, Chris Cacciatore, as well as his family members by making reference to, among other things, SOLIS's official acts taken in favor of Elgin Sweeping. Shortly thereafter, SOLIS received a \$5,400 monetary contribution from a company operated by Cacciatore's siblings.

56. On or about October 12, 2014, at approximately 11:42 a.m. (Session #1323), SOLIS placed a call to CALDERO. During the call, SOLIS asked CALDERO if he had any of that "medicine." CALDERO responded that he would make a call because "they" told him yesterday that they had it. CALDERO said that he would see if he could pick it up. Based on subsequent intercepted conversations between SOLIS and CALDERO, I believe SOLIS was referring to Viagra⁷ when he asked for "medicine."

57. On or about November 13, 2014, at approximately 3:14 p.m. (Session #4378), SOLIS placed a call to CALDERO. During the call, SOLIS asked CALDERO if he could bring any of that "blue medicine," which I understand to be a reference to Viagra. CALDERO agreed to make a call to see if he could get it done.

58. On or about November 15, 2014, at approximately 12:31 p.m. (Session #4559), SOLIS called CALDERO. During the call, SOLIS asked CALDERO whether he had located any Viagra for SOLIS. Specifically, SOLIS asked if CALDERO had any luck with the "blue medicine." CALDERO responded: "They told me it was supposed to come in yesterday." CALDERO explained that Viagra and Cialis are more difficult to get due to the Affordable Care Act, informing SOLIS that 10 pills cost approximately \$400, which surprised SOLIS. CALDERO told SOLIS that his supplier was supposed to receive a shipment of a couple of hundred

⁷ According to publicly available information, Viagra is a drug used to treat erectile dysfunction. According to photos of Viagra pills included in marketing materials for the pharmaceutical, the pills are blue.

Viagra pills and that CALDERO wanted 50 so that he would have enough for a while. In a subsequent recorded conversation, SOLIS and CALDERO arranged to meet in person. Because SOLIS expressed surprise regarding the cost of this pharmaceutical, the lack of discussion regarding payment in any of these calls, and the availability of this drug for purchase with prescription, I believe that SOLIS did not pay CALDERO for Viagra.

59. On or about December 25, 2014, at approximately 9:47 p.m. (Session #6885), SOLIS texted CALDERO. In the text, SOLIS asked: "Will u have any medicine [Viagra] tomorrow?" CALDERO responded, "Yes." SOLIS then responded, "Good, will contact you tomorrow."

60. On December 26, 2014, in a series of conversations (Session #6908, 6916, 6918, 6920), CALDERO agreed to meet SOLIS near Cicero and Belmont in Chicago to provide SOLIS with the Viagra.

61. On or about March 31, 2015, at approximately 11:28 a.m. (Session #8176), CALDERO called SOLIS. During the call, CALDERO asked SOLIS about whether it was possible to receive approval for re-zoning on a property located at Throop Street and Cermak Avenue in Chicago since SOLIS was reelected. SOLIS told CALDERO that he didn't know and needed to take a look at it. CALDERO said that he would call to set up a meeting with SOLIS to discuss that and other matters.

62. On or about April 3, 2015, at approximately 9:46 a.m. (Session #8334), SOLIS called CALDERO. During the call, SOLIS asked CALDERO why he wanted to meet with him. CALDERO informed SOLIS that

he had a "bunch" of different issues to discuss with SOLIS. SOLIS agreed to meet, specifying, "[D]on't bring anybody."

63. On or about May 27, 2015, at approximately 12:02 p.m. (Session #11974), SOLIS called CALDERO. During the call, CALDERO asked to talk with SOLIS regarding a water bill involving Chris Cacciatore, the president of Elgin Sweeping. Specifically, CALDERO said: "Look, I want to catch up with you. Could we have some time? . . . [I] need to talk you today though about this water bill thing with Chris Cacciatore." According to open source searches, Cacciatore is the president of Elgin Sweeping. According to the City of Chicago's website, Elgin Sweeping has several multi-million dollar contracts with the City of Chicago.

64. As the call continued, CALDERO said: "I just need to give you the basic information on it [referring to the water bill issue with Chris Cacciatore]. That's all I need to do." SOLIS directed CALDERO to provide the information to a legislative aide.⁸

65. On or about May 31, 2015, at approximately 8:41 p.m. (Session #12183), SOLIS called CALDERO. During the call, CALDERO requested SOLIS's assistance with obtaining approval by the City of Chicago for a special-use permit for A Fresh Start Recovery Homes,⁹ as well as his assistance with a water permit for Chris Cacciatore.

8 Based on interceptions over **Target Phone 2**, I believe the individual referenced in this call works for SOLIS.

9 According to public records, on May 28, 2015, the Zoning Board of Appeals denied A Fresh Start Recovery Homes' a special use permit to operate a particular community home group living facility in Chicago.

Specifically, CALDERO said that he needed to talk with SOLIS about A Fresh Start Recovery Homes and that "Judith [Judy Frydland, the new Buildings Commissioner for the City of Chicago] had told us that we should go in and apply for a special use permit. . . ." Later in the conversation, CALDERO added: "I really need to help Chris Cacciatore with this water permit, 'cause otherwise, he's going to start. . . ." SOLIS responded: "I told you, I told you I would set up a meeting just to find out how the hell they came up with that conclusion, you know?" CALDERO said: "I have no idea. So, ah, so if you want to call, you know, set up the meeting. But the other thing is the Fresh Start Recovery Homes. So, the, Judith [Frydland] told them, was very confident, that if we went in for a special use permit, that we could get it. But I think [Alderman Joe] Moreno changed his mind. 'Cause Moreno had been like neutral. Like I really don't, you know, like he had not been. So, when Moreno changed his mind and the Zoning Board of Appeals ruled against him" SOLIS said: "Yeah, but if you are going to ask Joe [Moreno] or any alderman to do something like that before an election, they are going to be at the very least hesitant." CALDERO responded: "No, no, no, we didn't. That's why we waited 'til after the election. No, I wouldn't have even tried it before the election. So, so, anyway, anyway, it got denied on Wednesday. So, we got to figure it out. I got to figure it out. I think I have a solution. We can figure out something that would protect them. It's kind of a weird thing. 'Cause here's the thing, the Zoning Board of Appeals only rules, what

the City is telling them, is that they can have eight people plus two managers in a place like that, and they don't need a special use permit. But the problem is that, unless you do twelve plus two, it's really kind of economically unfeasible to do it, because of all the testing, all of the other extra services you've got to do to keep that place going. So, anyway, let's sit down." CALDERO said that he would call or text SOLIS in the morning.

66. On or about June 4, 2015, at approximately 1:06 p.m. (Session #12438, 12439, 12440), SOLIS received text messages from CALDERO. The text messages contained information from an employee of the City of Chicago's Water Department. The texts stated: "Water Department[;] List of all equipment with license plate [;] Per unit \$83.78 a day for 5 days a week[;] From the start of the season to the end of the season[;] April 6-November 27, 2015; \$83.78 x 5 days = \$418.90 x 34 weeks = (\$14,242.60 per unit); X 75 trucks = \$1,068.095[.] Mike Tucker, Water Department."¹⁰

10 Based on my review of the contract Elgin Sweeping entered into with the City of Chicago, which was obtained from the City of Chicago's website, as well as my review of Elgin Sweeping's website, I understand that Elgin Sweeping is in the business of providing street cleaning services to the City and in connection with this type of service, Elgin Sweeping uses a fleet of vehicles. Based on my review of a City ordinance that was passed by the City Council on or about July 29, 2015, I know that when a fire hydrant is used to provide water for the filling of a truck or street sweeper, the amount charged for the water shall be \$83.78 per day. I believe this text message is meant to reflect the revised charges that Elgin Sweeping will incur as a result of this ordinance. While the text message reads "\$1,068.095," I believe this amount is a typographical error, and the amount should be \$1,068,195. Accordingly, I believe that as a result of the new ordinance, Elgin Sweeping would incur costs exceeding \$1 million, and that CALDERO wished SOLIS to prevent the new ordinance from fully applying to Elgin Sweeping. CALDERO's efforts to limit the application of the new ordinance to Elgin

67. On or about June 9, 2015, at approximately 7:42 p.m. (Session #12794), SOLIS received a call from CALDERO. During the call, CALDERO asked if SOLIS had a chance to talk with the Water Commissioner. SOLIS said "not yet," and asked CALDERO to remind SOLIS's scheduler to "set up a meeting [with the Water Commissioner]."

68. On or about June 15, 2015, at approximately 12:36 p.m. (Session #13027), SOLIS called CALDERO. During the call, CALDERO began to inquire about the Water Commissioner before he was interrupted by SOLIS. Specifically, CALDERO said: "[W]hat was I going to tell you . . . the Water Commissioner—" SOLIS then interrupted, informing CALDERO that he had just finished with the Finance Committee and just left because they were about to vote on the bond deal. SOLIS said he was going to bug his scheduler, "to get that scheduled." I understand SOLIS to be referring to a meeting regarding the Water Commissioner.

69. On July 2, 2015, at approximately 3:05 p.m. (Session #14202), SOLIS called CALDERO. During the call, SOLIS informed CALDERO that he was looking for a massage with a "nice ending." I believe that SOLIS was interested in a massage in which the masseuse would perform a sex act on SOLIS, which was referred to as a "nice ending."¹¹ CALDERO agreed to arrange such a massage for SOLIS later

11 Sweeping is discussed further herein. NCIC criminal history records reflect that ROBERTO CALDERO has a prior arrest for soliciting for prostitution that occurred more than 10 years ago. On or about May 30, 2015, at approximately 10:44 a.m. (Session #12128), CALDERO called SOLIS. During this call,

that night and also asked SOLIS if he had received feedback from the Water Department. Specifically, SOLIS said: "[L]et me tell you why I called. I want to get a good massage, with a nice ending. Do you know any good places?" CALDERO informed SOLIS that he knew of such a place, and explained that he "and [name redacted] were just there like Monday." SOLIS responded: "You want to go tonight sometime?" CALDERO agreed to do so and said that he would make an appointment: "You got to give me a time and I can call. You got to call for an appointment." SOLIS asked: "What kind of women do they got there?" CALDERO responded: "Asian." SOLIS said: "Oh good! Good, good, good. I like Asian." CALDERO responded: "It's [name redacted]'s absolute favorite." SOLIS asked: "Asian?" CALDERO confirmed. SOLIS then specified: "Okay, you tell, tell them I want the same one that does [name redacted]." CALDERO said he would schedule an appointment. CALDERO said: "Let me make sure that it's available, and then what else was I going to tell you? Oh, the Water Department--did you get any feed back?" I believe CALDERO is asking SOLIS if he received

SOLIS asked CALDERO to investigate a massage parlor that might be offering prostitution services. SOLIS directed CALDERO to send someone to the massage parlor to see what services they offered. Specifically, SOLIS said: "[J]ust send somebody over there to get a massage. See what happens." CALDERO asked for the address, which SOLIS provided. As the call continued, SOLIS said: "Just check it out, you know. 'Cause they just opened on the 15th so they may not do anything for now. But it's not just happy endings [sex act performed on the customer]. I think the idea that they also have girls without any licenses, masseuses without any licenses." CALDERO responded, "I'll check out whether the licenses and the names. I'll check it out." SOLIS instructed CALDERO to send someone else to investigate because CALDERO might be identified. In a subsequent call, SOLIS suggested this business might be associated with SOLIS's former girlfriend.

any feedback concerning Elgin Sweeping's problem. SOLIS said: "[W]e can talk when we get together."

70. On July 2, 2015, at approximately 5:35 p.m. (Session #14245), SOLIS called CALDERO. During the call, SOLIS and CALDERO discussed their visit to a massage parlor. Specifically, SOLIS asked CALDERO where he was. CALDERO said that he was five blocks away. CALDERO instructed SOLIS: "Her name is [nsame redacted]. Just tell her you're there to see, you're with me. Tell her you're there for the six o'clock with Roberto."¹²

71. FBI surveillance observed SOLIS enter **Subject Location 5**, which is on the north side of Chicago, at approximately 5:36 p.m. later that evening. A vehicle registered to CALDERO was observed parking in front of **Subject Location 5** at approximately 5:42 p.m. A lone male exited the vehicle and entered **Subject Location 5**.

72. On July 9, 2015, at approximately 12:17 p.m. (Session #14652), CALDERO called SOLIS. During the call, CALDERO asked SOLIS to join him at the same massage parlor, **Subject Location 5**. SOLIS agreed to go. Specifically, CALDERO said: "Hey, listen, tomorrow at nine o'clock. You want to get together with [name redacted] in the evening?" SOLIS said: "Yeah, yeah. That's 'cause, that's tomorrow is the last day I'm here. Yeah, let's do that." CALDERO said: "Yeah, yeah. That's what I thought. He just called me. He's

12 None of the bank records obtained during the course of this investigation and relating to accounts used or controlled by SOLIS show any payments to or credit card transactions at **Subject Location 5**.

gonna come in at . . . I'm picking him up at the airport at eight. We're gonna go to the place we went to on Milwaukee¹³ at nine." SOLIS responded, "Excellent, excellent. That's great." CALDERO said: "Okay. I'll try to set it up."

73. On July 10, 2015, at approximately 11:53 a.m. (Session #14799), SOLIS called CALDERO. During the call, SOLIS asked CALDERO if they were still getting together at **Subject Location 5** that evening. Specifically, SOLIS asked: "Are we still meeting today?" CALDERO responded: "At what time? Hold on, hey, Danny. Yeah, we're meeting. I'm picking up [name redacted] at 8." Later, SOLIS asked CALDERO: "Okay, so are you making the arrangements with the, uh, massage place?" CALDERO responded: "Yeah, those are already made, and we're set up for nine o'clock. Same girl you had last time." SOLIS said: "Okay, okay. Hey, listen, I'm going to, I'm leaving for Taiwan tomorrow morning." CALDERO responded: "Yeah, you told me you're leaving tomorrow, right?" SOLIS then asked: "Yeah, is there any way you can get me, uh, any more of that medicine [Viagra] you got me last time?" CALDERO said: "I've got some on me. I can let you have some, yeah." SOLIS responded: "Yeah, yeah. Whatever you can would be appreciated."

74. About an hour later, at approximately 12:51 p.m. (Session #14814), CALDERO sent a text message to SOLIS. The text message said: "Can have someone follow up with the water department concerning Elgin sweeping[?]" SOLIS responded to the text message (Session

13 The street CALDERO referenced is the same street where SOLIS was observed on July 2, 2015, when he entered **Subject Location 5**.

#14815) by telling CALDERO to call an individual, who was referenced by their first name. Based on that first name, and my review of records maintained by the City of Chicago, I believe SOLIS instructed CALDERO to contact a legislative aide who works for SOLIS at **Subject Location 1**, to set up a meeting to discuss the official action SOLIS may take on behalf of Elgin Sweeping.

75. FBI established surveillance in the area of **Subject Location 5** that evening— the same location where the FBI had seen SOLIS and CALDERO on July 2, 2015. At approximately 8:55 p.m., surveillance observed SOLIS enter **Subject Location 5** and proceed past the reception area. At approximately 9:05 p.m., surveillance observed CALDERO's vehicle pull in front of **Subject Location 5**. At that time, a third man exited the vehicle. Surveillance observed the third man enter **Subject Location 5** after being let inside the locked door of **Subject Location 5** by a woman who arrived at **Subject Location 5** shortly after the third man. Surveillance observed the third man proceed past the reception area. Shortly thereafter, CALDERO approached **Subject Location 5** on foot and entered **Subject Location 5** at about 9:08 p.m. Surveillance observed CALDERO walk past the reception area. At approximately 9:53 pm., surveillance observed a woman at the front counter of the reception area appear to conduct a transaction with a male, believed to be CALDERO. Surveillance then observed CALDERO walk out of **Subject Location 5**. Surveillance then observed CALDERO park his vehicle on the street at 10:08 p.m. and reenter **Subject Location 5**. At approximately 10:18

p.m., surveillance observed CALDERO exit **Subject Location 5**. A few minutes later, surveillance observed CALDERO's vehicle conduct a u-turn and park in front of **Subject Location 5**, and then CALDERO exited the vehicle and reentered **Subject Location 5**. At approximately 10:22 p.m., surveillance observed SOLIS, CALDERO and the third man exit **Subject Location 5**. Surveillance observed that SOLIS, CALDERO and the third man exited **Subject Location 5** without appearing to conduct a transaction at the counter and then entered CALDERO's vehicle, which then departed the area.

76. On or about July 27, 2015, at approximately 1:54 p.m. (Session #14970), SOLIS called CALDERO. During the call, SOLIS and CALDERO discussed an ordinance relating to the City's Water Department. Specifically, CALDERO said: "Hey, ah, I needed to, talk to you for a few minutes on this ah, bill for the water, ah the ordinance for the Water, ah Department." SOLIS said: "Did Chris ever talk to Tom Powers [the Commissioner of Water Management]?" CALDERO said: "I don't know if they communicated, I don't think they have. I sent you a draft that I believe we can change the ordinance by including one sentence in there. Did you take a look at it?" SOLIS said: "No, no. I've been running around. Ah, give it to [SOLIS's legislative aide]." CALDERO agreed to send the draft to the aide and said that he also sent it to SOLIS's "personal email."¹⁴

14 Based on information developed during this investigation, SOLIS uses daniel.solis410@gmail.com as his personal email address. For example, information provided by Google reflects that the recovery email associated with the account is daniel.solis@cityofchicago.org. As noted above, SOLIS is employed

Later, CALDERO explained his proposed revision to the ordinance would provide that if a person was providing "water, for a public service on behalf of the state, the city or the federal government, that you would be limited to an increase of no more than 25 percent over your last bill." I believe CALDERO asked SOLIS to use his official position as an Alderman in order to assist CALDERO's client in receiving an exemption from legislation, so that CALDERO's client will not have to pay the City as much for water usage. Thereafter, SOLIS instructed CALDERO to tell his aide to "bring it to the attention of Claudia Clàudia from the mayor's office."

77. On or about July 27, 2015, at approximately 3:03 p.m. (Session #14999), SOLIS called Joe Cacciatore, a sibling of Chris Cacciatore. Joe Cacciatore suggested that he and SOLIS get together for a game of golf. SOLIS agreed, and added: "I met with your brother and Roberto a couple of weeks ago, I'm trying to help them with that housing thing [in reference to A Fresh Start Recovery Homes]." Joe Cacciatore replied that was "good" and that he wanted to talk to SOLIS about other matters. SOLIS then said: "The reason I also called you is for my event on the 10th, September 10th, my Taste of the 25th Ward. I'm hoping you and your family can help me out as you usually do." Joe Cacciatore replied "we definitely will." SOLIS asked if

by the City of Chicago as an Alderman. Accordingly, the use of an email address associated with the City of Chicago in connection with danielisolis410@gmail.com confirms this account is used by SOLIS. As discussed above, Gmail is an email service offered by Google. Accordingly, I have reason to believe that the delivery of the email from Caldero to SOLIS's Gmail account required the use of the channels of interstate commerce. Based on this, I believe SOLIS caused an interstate wire transmission in order to carry out this offense.

Joe Cacciatore wished to "coordinate that" [donations to SOLIS] with the rest of the family, or if Joe Cacciatore preferred that SOLIS call the "other guys separately." Joe Cacciatore indicated that he preferred to coordinate the donation from the family: "I'll take the lead on that, okay?" SOLIS agreed, and noted "I think I'm going to see Chris [Cacciatore], ah tomorrow on, on some ordinance that I have to do for the Elgin thing," in reference to Elgin Sweeping. SOLIS added: "I have to rework it." Joe Cacciatore told SOLIS: "you can let Chris know that we, we spoke about it, but I'll take the lead in terms of coordinating everyone in my family." SOLIS said: "If you guys could help me reach a certain amount, that would be very helpful. Okay?" Joe Cacciatore said: "Yep. I hear ya."

78. On or about July 27, 2015, at approximately 4:02 p.m. (Session #15056), SOLIS called CALDERO. During the call, SOLIS and CALDERO discussed SOLIS's intention to call Chris Cacciatore to solicit a monetary contribution. SOLIS advised CALDERO that he was at Tom Bowen's¹⁵ office "cause I'm doing my, uh, calls for my fundraiser." SOLIS added: "I was gonna call Chris Cacciatore, but before I called him I want to talk to you, um, tomorrow I'll follow up with that ordinance they need." CALDERO said: "Uh huh, yeah, let's not connect the two. Listen, I just, I just had lunch with Chris, he just gave me a check for \$5,000 for [name redacted], okay, I have the same commitment for you." [I understand this to be a warning

¹⁵ Based on the interceptions to date, I believe that Tom Bowen handles media affairs for SOLIS. Bowen is not believed to be a city employee.

from CALDERO to SOLIS that they should not explicitly link a financial contribution to SOLIS's actions on behalf of CALDERO's client.] SOLIS said: "Well, scratch out [name redacted's] name and put my name on there dumb dumb." CALDERO said: "I can, I can white it out. I can, I think they still sell White Out." SOLIS laughed and the call was abruptly terminated.

79. On or about July 27, 2015, at approximately 4:04 p.m. (Session #15057), SOLIS called CALDERO. During the call, SOLIS continued discussing his intention to call Chris Cacciatore. Specifically, SOLIS asked CALDERO how he should time his call asking for a monetary donation from Chris Cacciatore in relation to SOLIS's official action on behalf of Chris Cacciatore: "So should I call him or should I wait for you?" CALDERO replied: "You should look at that ordinance first, get clearance from, make sure that it's not going to be a problem, I tried to find . . . problem but you gotta let me know if that works." [I believe CALDERO to be suggesting that SOLIS should ensure he could take official action benefitting Chris Cacciatore before soliciting money from him.] SOLIS confirmed: "Yeah, yeah, yeah, I'll find out tomorrow. Okay, so I'll hold off on that, but then I also want you to line up other potential contributors." CALDERO said: "You have 10 committed. Danny, you have 10 committed from me all together, okay?" [I believe this means that CALDERO was prepared to arrange for a total contribution of at least \$10,000 to SOLIS from various donors.] SOLIS said: "Okay."

80. On or about July 27, 2015, at approximately 4:45 p.m. (Session #15071), SOLIS received an incoming call from a member of his Aldermanic staff. During the call, SOLIS and the staff member discussed the status of Elgin Sweeping's proposed amendment to the water ordinance. The staff member advised SOLIS that Tom Powers needed to speak with SOLIS about "an ordinance going in for Elgin Sweeping." The staff member indicated that Powers had been trying to get in touch with someone from Elgin Sweeping for the last two to three weeks, and that Powers had an issue with "what they are proposing." SOLIS instructed that he wanted Powers to talk to Elgin Sweeping before SOLIS talked to Powers: "Have them talk before I talk to them." SOLIS advised he would talk to him [Powers] tomorrow. The staff member noted that Powers was "worried" because the ordinance was "going in tomorrow." SOLIS reiterated that Powers should talk to them [Elgin Sweeping] before SOLIS talked to them.

81. On or about July 27, 2015, at approximately 7:03 p.m. (Session #15096), SOLIS made a call to a member of his staff. During the call, SOLIS and the staff member discussed the status of Elgin Sweeping's proposed amendment to the water ordinance. The staff member noted that the Water Commissioner was "concerned" with "some of the items in the ordinance," and allegedly had been trying to get ahold of Chris Cacciatore to "clarify . . . some of the items that are pending." The staff member added that the Water Commissioner did not want to let the amendment proceed the following day without obtaining further information: "He's trying to solve this, but he

doesn't want to go in there . . . trying to push this through." SOLIS expressed his displeasure at this development: "It's very simple . . . and I think somebody's bullshitting me. I mean, I met with them, he [Powers] said he would work on it, now he's saying he can't get a hold of 'em. So, what's his, what's his suggestion then?" The staff member indicated that the Water Commissioner preferred to have the water ordinance pass without Elgin Sweeping's proposed amendment, and "then continue to work on it with 'em until the next council meeting, or committee meeting." SOLIS again expressed his displeasure: "Why does he [Powers] let me know this now?" SOLIS indicated he would call CALDERO.

82. On or about July 28, 2015, at approximately 8:20 a.m. (Session #15116), SOLIS called CALDERO. During the call, SOLIS and CALDERO discussed the proposed amendment to the water ordinance. CALDERO advised that he had given Chris Cacciatore "the office number for Tom Powers," and that he would instruct Cacciatore to call Powers at 9:00. SOLIS instructed CALDERO to have Cacciatore call Powers at 8:30. SOLIS added: "He wants me to let it pass as is, and then we'll take care of it at the next committee meeting." CALDERO said: "Okay, as long as we understand what it is that we're going to fix at the next meeting, that's fine." SOLIS said: "Yeah, alright, we'll talk later."

83. On or about August 5, 2015, at approximately 1:59 p.m. (Session #15806), CALDERO called SOLIS. During the call, SOLIS agreed to set up a meeting with the City of Chicago's Water

Commissioner. Specifically, CALDERO said: "Ah, couple things, listen, I haven't gotten any direction on where we're going with this water issue." SOLIS said: "They're [the Water Department] supposed to take care of it for me, ah, outside of the ordinance. So, ah, ask [a SOLIS legislative aide] to follow up with the meeting with the commissioner to me." [I understand SOLIS to mean that he had arranged for CALDERO's request for relief on behalf of Elgin Sweeping/Chris Cacciatore to be handled ("take care of it for me") without having to make a formal amendment to the applicable city ordinance.] CALDERO said: "He's called, he's called the commissioner three times, like Friday, Monday, and Tuesday." SOLIS asked: "Who did?" CALDERO said: "Chris, Chris Cacciatore called because that's what—" SOLIS said: "No, no, no. Tell [a SOLIS legislative aide] . . . to set up a meeting with me and the Commissioner." CALDERO said: "Okay. Not a problem." SOLIS said: "I want to see how he [the Water Commissioner] is going to take care of [unintelligible]."

84. On or about August 18, 2015, at approximately 8:04 a.m. (Session #16962), CALDERO sent a text message to SOLIS. CALDERO wrote: "I'm meeting with Chris in a few minutes regarding the water department give me a call when you get a chance." I believe CALDERO wished to speak to SOLIS about his effort to obtain an exemption from an ordinance for his client.

85. On or about August 18, 2015, at approximately 8:04 a.m. (Session #16963), CALDERO sent SOLIS a text message. CALDERO wrote:

"We have a meeting at 930 with the water department." I believe CALDERO was advising SOLIS that he has an impending meeting with city officials concerning his request for an exemption from an ordinance on behalf of his client.

86. On or about August 19, 2015, at approximately 3:55 p.m. (Session #17073), CALDERO called SOLIS. During the call, the men discussed monetary contributions to SOLIS. Specifically, CALDERO said: "Ah, the meeting with the Water Commissioner went well. I think we resolved the problem. I think, I think it's going to be okay. It looked good. It looked very good. They were pleased with the meeting." SOLIS said: "Good, good." CALDERO said: "They're, they're working on it." SOLIS said: "I hope, I hope Chris remembers that." [I believe SOLIS was telling CALDERO that SOLIS hoped Chris Cacciatore would remember SOLIS's assistance with the Water Commissioner when it came time to give money to SOLIS.] CALDERO said: "Yeah, well, no, Chris [unintelligible], look . . . listen Danny, I've been with Chris for years now. He just gave me \$5,000 for [name redacted's] campaign. You know, he wrote me a personal check, and he'll write me a corporate check for you, you don't have to be personal for your fundraiser right?" SOLIS said: "Right." CALDERO said: "Yeah, he doesn't have a problem, he's already come in and said: 'Hey, I've got \$5,000 for Danny,' you know, and so forth, okay? Now, more-also, but add, this will be important. He got a call from his brother in the real estate division, ah, Peter [Cacciatore]."¹⁶ And

¹⁶ The website for Jos. Cacciatore & Co. Real Estate reflects that this

apparently Joe went to Peter and said that he wanted a check for \$5,000 for your fundraiser. And Peter and these guys don't want to do it through Joe." SOLIS said: "I don't care who gives it to me." SOLIS and CALDERO engaged in simultaneous conversation. CALDERO said: "I know you, I know you don't, but I just want you to realize what the situation is, because, you know, so, but they do, so, you know, like, I'll, I'll figure it out. But let's get together and talk tomorrow." CALDERO asked what time the men could meet. SOLIS said: "Look, I've helped them both. I've helped Joe. I've helped Chris." CALDERO said: "Well, that's what I mean, but here, I gave, I gave your, your guy a list. You should call Philip, who's the head of the bank personally, and say: 'Philip, I want you to come to the fundraiser.' You should call, ah, Peter. He'll definitely come to the fun-All of them own the properties over there, so they all, you know like, you know, but they're very, you know, they're just very reluctant to deal with Joe because they've got a lot of problems with Joe." Shortly thereafter, SOLIS said: "Well, you know, Joe should, ah, support me on his own funds because I've helped him a lot." CALDERO said: "He, yes, but that's what I'm trying to tell you. He won't write a check. I doubt it. Maybe he will now. I don't know, but, he hasn't written a check before. He's never written a check. Not to you or anyone else." Shortly thereafter, SOLIS indicated that he had to go, and the men agreed to talk later.

company is involved in real property management, development, and sales. Two individuals identified in the "Who We Are" portion of the website are Peter C. Cacciatore and Joseph P. Cacciatore.

87. On or about August 21, 2015, at approximately 11:19 a.m. (Session #17226), SOLIS called CALDERO. During the call, SOLIS advised CALDERO of his efforts to obtain money from members of the Cacciatore family. Specifically, SOLIS said: "Hey, I met with Joe last night." CALDERO said: "Good." SOLIS said: "He said he's in to be a 'Chairman' at 5400 [which I understand to mean Joseph Cacciatore agreed to make a monetary contribution to SOLIS of \$5,400]. I didn't tell him I knew that he was trying to hit up his brother to do it, though." CALDERO said: "The 5400 is from the real estate company. They called me yesterday and they don't want it under Joe's name. You do whatever you want with it, but—" SOLIS said: "Well, I'm calling, I called Peter [Cacciatore] and Phil [Cacciatore]. What's the other brother?" CALDERO said: "Uh, Peter, Phil, and Chris." Shortly thereafter, CALDERO said: "Tell him, tell him to write you a check because the real estate company, they're gonna write you. In fact, they mentioned specifically 5400, but they're not writing it on Joe's behalf." Shortly thereafter, CALDERO added: "And they want to, you know, they want to meet with you. Can you set up a meeting with Thompson and Peter next week?" SOLIS asked: "Thompson who?" CALDERO said: "The alderman." SOLIS said: "Yeah, yeah. On what?" CALDERO said: "Uh, the property they have. They want to do some retail. They want a [zoning] change." SOLIS instructed CALDERO to remind him on Monday about his desire to set up the meeting. CALDERO invited SOLIS for a massage and lunch, which SOLIS accepted.

88. A little over an hour later, at approximately 12:36 p.m. (Session #17242), SOLIS received a call from CALDERO. During the call, CALDERO discussed arranging a massage for SOLIS. Specifically, CALDERO said: "The girl you had before was [name redacted], correct?" SOLIS said: "I don't know, the older lady." CALDERO said: "Yeah [name redacted], I believe her name was [name redacted]." CALDERO said she was available at one o'clock. SOLIS told CALDERO he would "be over there by one."

89. FBI established surveillance in the area of **Subject Location 5**—the same location where the FBI had seen SOLIS and CALDERO on July 2, 2015, and July 10, 2015. At approximately 1:00 p.m., surveillance observed SOLIS enter **Subject Location 5**. At approximately 1:07 p.m., CALDERO was seen **Subject Location 5**. At approximately 1:08 p.m., CALDERO exited **Subject Location 5**, and then returned to **Subject Location 5** at approximately 1:10 p.m. Both SOLIS and CALDERO were seen departing **Subject Location 5** at 2:08 p.m.

90. Records obtained from the Illinois State Board of Election show that Jos. Cacciatore and Co., the real estate company owned by Chris Cacciatore's relatives, made a monetary contribution of \$5,400 to Citizens for Danny Solis on or about September 21, 2015.

ii. **SOLIS's Receipt of Benefits from FREDERICK LATSKO and SOLIS's Official Action on Behalf of LATSKO.**

91. FREDERICK LATSKO is a local real estate developer who frequently has business before the City Council. Publicly available information reflects that LATSKO is associated with Structure Management Midwest LLC, a company whose business includes real estate

development projects. Records maintained by the Illinois State Board of Elections reflect that LATSKO gave SOLIS a \$5,000 campaign contribution on or about January 30, 2013, and that Stucture Management Midwest gave SOLIS a \$5,000 campaign contribution on or about April 10, 2014. Publicly available information reflects LATSKO's involvement with multiple real estate development projects in the Chicago area, including projects that required zoning approval from the City of Chicago. For example, the publication Crain's reported on or about July 26, 2013 as follows: "A venture led by Chicago trader Don Wilson plans to build a 40-unit luxury residential tower at State and Elm streets in the Gold Coast. The venture, whose owners also include Chicago developers Fred Latsko and Mark Hunt, filed July 24 for a zoning change for the property that would accommodate a tower of up to 335 feet, more than twice the 155 currently allowed, according to documents filed with the city." In addition, as noted herein, LATSKO has noted he recently discussed other development projects with the landlord for Marisol Solis's business.

a. LATSKO Provides SOLIS with Benefits.

(1) LATSKO Provides SOLIS with the Use of His Multi-Million Dollar Farm for a Weekend Graduation Party.

92. Multiple stories published on the internet reflect that LATSKO purchased a farm from Oprah Winfrey for \$3.25 million. One of these articles, appearing on the website chicagobusiness.com, indicates that LATSKO intended to rent out the 180-acre estate for

select occasions at a rate of \$20,000 a day (the story, dated March 5, 2011, is entitled "Fred Latsko to rent out Dewes Mansion and Oprah's former vacation home.").

93. On or about May 28, 2015, at approximately 12:23 p.m. (Session #12024), SOLIS made an outgoing call on **Target Phone 2** to PATRICIA SOLIS DOYLE, his sister and a business partner of BRIAN HYNES. During the call, SOLIS and DOYLE discussed a family party at LATSKO's farm to celebrate his son's graduation. Specifically, SOLIS asked DOYLE when she would be in town, and told her: "Okay, 'cause I've got Fred's [LATSKO's] farm in Indiana uh, for Daniel's uhm, graduation party."¹⁷ DOYLE said: "Wow!" SOLIS advised DOYLE she could stay at the farm overnight. SOLIS advised DOYLE that "I can get it the whole time you are here, or a couple of days, whatever." DOYLE concluded the call by telling SOLIS not to invite LATSKO or BRIAN HYNES to the graduation party on LATSKO's farm: "And don't

17 As noted earlier, the government has obtained bank records from several financial institutions during the course of the investigation, including financial institutions where SOLIS holds accounts. The records obtained to date do not reflect any payments made by SOLIS to LATSKO on account of the use of the farm. However, in order not to compromise the investigation, the government has not yet issued subpoenas for all known bank accounts of SOLIS. There have been no interceptions between SOLIS and LATSKO that indicate that SOLIS paid for the use of the farm (other than, as noted herein, payment for staff acting as decorator(s) and server(s) for the party). During the course of the investigation and based on intercepted conversations (Session #11437, 11456), SOLIS also borrowed \$160,000 from businessman GARY FEARS to retire a debt on a property in a loan arranged by BRIAN HYNES. Indeed, given SOLIS's need to borrow \$160,000 from FEARS, SOLIS's poor credit history, and his stated inability to pay an outstanding debt of \$12,274 as discussed above, I believe it is unlikely that SOLIS had the financial resources to rent a property that LATSKO sought to rent at the rate of \$20,000 a day.

invite, tell Fred and Brian to stay home. This is a family event."
SOLIS said: "Alright."

94. On or about June 8, 2015, at approximately 10:43 a.m. (Session #12687), SOLIS made an outgoing call on **Target Phone 2** to DOYLE. During the call, SOLIS and DOYLE discussed the party to be held at LATSKO's farm. During the call, DOYLE asked: "Can we go, spend the night there [at the farm] on Friday night?" SOLIS replied: "Yeah, uh, th-, th-, not, not, not everybody can. But they've got, he's got about five bedrooms, so I told him five to ten people would be there Friday night." DOYLE said: "Okay, great." SOLIS said: "And then about thirty, and then about thirty to forty on Saturday." DOYLE said: "Holy moley. Awesome." SOLIS said: "Well, we got a big family, don't we?" DOYLE replied: "Yeah, we have a, yeah, a huge family. Well, who's gonna, like, what, what are you doing for fo-, like, who, who's working it? Food, and all that stuff." SOLIS said: "I . . . think that staff that's there will work it. I'll just pay them. And, um" DOYLE said: "Wow." SOLIS said: "But that's what I'm planning on doing. I'll work, I'll figure that out this week. The next day or two. Today or tomorrow."¹⁸

95. On or about June 9, 2015, at approximately 10:01 a.m. (Session #12757), SOLIS made an outgoing call on **Target Phone 2** to an employee of LATSKO who worked at LATSKO's farm. Based on the telephone number used by the farm employee, which included the "219"

18 Multiple calls have been intercepted wherein SOLIS invites potential guests to the party and notes that the party will take place at a "friend's" farm.

area code for northwest Indiana, and the content of the conversation, I believe that the farm employee was in Indiana during this telephone call while SOLIS was in Illinois. During the call, the two discussed the plans for the graduation festivities to be held at LATSKO's farm. Specifically, SOLIS asked if there would be enough sleeping accommodations for his family: "I've got, I had just one of my sisters, and her family, and me and my family going, but there might be at least one or two more families on Friday night and I'm just trying to figure out if there are enough bedrooms for that many people." The farm employee assured him there would be enough space for his extended family: "You know what, . . . I think for four families, . . . we have, in the guest house, we have two kings, two queens, one full, one, two, three, three twins. I think there will be plenty of room." The farm employee discussed the catering options available for lunch on Saturday, including using a restaurant owned by LATSKO: "Or we can do Chicago Q, which we, we go pick it up or I just have somebody from Chicago bring it out for us and then we would set that all up." SOLIS decided to use this catering option: "Q. Good. Let's do that. And and you can get somebody to pick that up and bring it, I don't have to pick it up and bring it?" The farm employee responded: "No, no, no, we'll take, we'll definitely take care of it." SOLIS specified that the catered meal would be for "at least thirty, possibly forty" people. The farm employee noted that "maybe Fred is out here this weekend too." SOLIS said: "We could say hi and thank him for his very, his generosity." The farm employee

advised SOLIS that there would be a "huge variety of liquor" available and said "then that's up between you and Fred." SOLIS said: "Yeah." The farm employee reiterated: "What you do there is, is between you two." SOLIS said: "Uh huh." The farm employee asked: "And um, would you like a variety of liquor and beer?" SOLIS answered: "Yeah. We're mostly beer and wine." The farm employee replied: "Oh, beer and wine, okay great, no problem." SOLIS added: "But you know some of us, me in particular, I just have some vodka. But it's mostly beer and wine people." SOLIS and the farm employee also discussed who would act as a server during the event. During the call, the farm employee asked if SOLIS wanted the pool house "decorated a little bit" for the party. SOLIS said: "That would be nice." The farm employee noted that she had a "friend that comes in to decorate the farm," and SOLIS responded that "I'll pay, I'll pay anybody that is going to be helpful. So whatever."¹⁹ I believe SOLIS indicated he would pay for the decorator and possibly other servers at the function. However, because there were no intercepted conversations about SOLIS's payment of LATSKO for (i) the use of the farm for the weekend, (ii) the catered meal for up to forty people from LATSKO's restaurant, Chicago Q, and (iii) the liquor provided for the weekend, and because of SOLIS's relative financial condition and the absence of any bank records pointing to such payment (based on the records

19 Towards the end of the conversation, SOLIS instructed the farm employee to tell him "how much I'm paying each person and I'll make sure I get either a check or cash, whichever they prefer."

obtained to date), there is reasonable cause to believe that SOLIS did not pay LATSKO for any of these items.

96. On or about June 12, 2015, at approximately 10:06 p.m. (Session #12890), SOLIS placed an outgoing call on **Target Phone 2** to DOYLE. During the call, SOLIS and DOYLE discussed logistics concerning a graduation party for SOLIS's son at LATSKO's farm. Specifically, DOYLE said: "It's [the farm's] really cute." SOLIS said: "Wait till you see it in daylight." Later in the conversation, DOYLE said: "I think the [farm employee] is asleep at the mansion. It's pretty late. They just left the guest house open for us and we just came in." SOLIS said: "Alright, I'll see you in the morning. Wait for, wait for the girls, okay?" DOYLE confirmed: "Oh yeah, we'll wait."

97. On or about June 13, 2015, the FBI conducted air surveillance in the vicinity of 9252 North 600 East, Rolling Prairie, Indiana, the location of LATSKO's farm. At that time, the FBI observed a number of vehicles and multiple individuals on the tennis courts, in the pool, and at the pond. Surveillance was unable to distinguish particular individuals or vehicles.

(2) LATSKO Agrees to Enter into a Lease for a Dance Studio Property at SOLIS's Direction in Order to Take Revenge on the Former Business Partners of SOLIS's Daughter.

98. The government has intercepted multiple conversations during which SOLIS discussed a business problem involving his daughter, Marisol Solis. In summary, these interceptions revealed that Marisol Solis was embroiled in a dispute with her business

partners concerning the operation and control of a dance studio. The interceptions reflect that Marisol Solis was ousted by her partners from the daily operations of the dance studio. Further, the interceptions reflect that SOLIS planned to retaliate against Marisol Solis's business partners by having LATSKO acquire a lease to the real property that the dance studio operates on by paying 12 months of rent up front, and then causing LATSKO to take acts to potentially evict Marisol Solis's adversaries. LATSKO agreed that he would rent the property at SOLIS's direction, although LATSKO ultimately did not rent the property because SOLIS's daughter was unable to decide if she wished to run the dance studio. Representative interceptions are detailed below.

99. On or about April 14, 2015, at approximately 1:25 p.m. (Session #8814), SOLIS received an incoming call on **Target Phone 2** from LATSKO. During the call, SOLIS asked LATSKO to take retaliatory action against Marisol Solis's business partners. SOLIS said: "Did Brian [HYNES] brief you about the situation with my daughter who has the dance studio?" LATSKO said: "Yes." SOLIS said: "Anyways, they met today and they removed her from the board of directors and they fired her as an employee. And I'm hoping that, uhm, we might be able to do something." LATSKO said: "I just asked him to get me a name and number of the guy. That's all. Not you [SOLIS], have him get it to me, have Brian [HYNES] get me that name and that number. He's supposed to get me a name and number and I'll make the call right now." SOLIS said: "Alright, alright. We'll talk later."

100. On or about April 15, 2015, at approximately 2:49 p.m. (Session #8935), SOLIS received an incoming call on **Target Phone 2** from LATSKO. During the call, LATSKO reported on his efforts to obtain a lease for the property that housed the dance studio. Specifically, LATSKO reported that he had called "him" [the landlord] and informed the landlord that LATSKO wished to rent the property. LATSKO advised SOLIS that he had informed the landlord that he (LATSKO) would provide 12 months of rent up front. LATSKO added: "I basically said to him, I want to make sure that she [Marisol Solis] keeps the space, that month-to-month is gone. He said: 'Let me figure out a number and whatever I come up with that is market, I'm going to take something off because of her, her dad [I believe the landlord was indicating to LATSKO that he would discount the rent because SOLIS was Marisol Solis's father]'. I said: 'That's up to you, maybe you'll have a conversation with him, I don't know, but whatever it is, I'm the one that's going to sign the lease and I'm the one that's going to rent the space, so be assured that uh, nobody asked me to call.' I just heard the situation and I just called you on my own and I know that this is what they want." [I believe that LATSKO lied to the landlord and informed the landlord he was calling on his own accord about the property, and not at SOLIS's behest.] SOLIS shortly thereafter said: "That's fantastic Fred. That is great. That is fantastic, uh." LATSKO added: "And Danny, the guy, he knows who I am. He asked me about my developments. He kept me on the phone for an hour."

101. On or about April 15, 2015, at approximately 2:55 p.m. (Session #8937), SOLIS placed an outgoing call on **Target Phone 2** to Maya Solis, his daughter. During the call, SOLIS instructed Maya Solis to advise her sister, Marisol Solis, about LATSKO's actions, but to keep SOLIS's involvement concealed. Specifically, SOLIS said: "I want to communicate that [LATSKO's plan to rent the property] to Sol, 'cause that's going to be her leverage. But I don't want to do it. You should do it but she should just keep it quiet."

102. On or about April 15, 2015, at approximately 3:06 p.m. (Session #8943), SOLIS received an incoming call on **Target Phone 2** from LATSKO. During the call, LATSKO updated SOLIS on his efforts to rent the property housing Marisol Solis's dance studio. Specifically, LATSKO said: "Not to worry, uh, you don't need to talk to anybody. He [the landlord] did want to raise the rent anyway." LATSKO added that the landlord would offer a concession on the rent: "He said, but don't worry about whatever it is, I'll still knock something off because of my relationship." LATSKO indicated he wanted the landlord to deal with him, not Marisol Solis: "Well, I don't want him dealing with her. I want him dealing with me." SOLIS said: "Good, good, good." LATSKO added: "Because I think if you deal with her, they'll, they'll, they [Marisol Solis's business partners] would have a problem against her for interference." LATSKO advised that he would evict Marisol Solis's adversaries from the property: "Well, the bad guys are going to get a notice that they have to move out." SOLIS replied: "Excellent. That's excellent. Excellent."

103. On or about April 15, 2015, at approximately 5:15 p.m. (Session #8969), SOLIS received an incoming call on **Target Phone 2** from Marisol Solis. During the call, SOLIS provided Marisol Solis with a cover story to use concerning LATSKO's involvement in the plan to rent the dance studio property. Specifically, SOLIS said: "It's very important Sol, that you know nothing. . . . Okay, so whatever I told you in your mind is forgotten about. You don't know any of the parties. You may, you may know, [unintelligible]: 'I think he's [LATSKO's] a family friend, you know, I don't know anything else.' You don't know anything. This is the same thing Brian [HYNES] was telling us last week [unintelligible] ten days ago." SOLIS advised Marisol Solis to only confide in her attorney: "Just listen to whatever [name redacted] is telling you because he's your attorney. You don't talk to Maya, or to me, just tell everybody just to shut up and not say anything." SOLIS added: "The only person you talk to is [name redacted]. That's a lawyer-client privilege you know."²⁰

104. On or about April 30, 2015, at approximately 5:52 p.m. (Session #10076), SOLIS placed an outgoing call on **Target Phone 2**

²⁰ SOLIS has indicated that he had an interest in Marisol Solis's business when it was first purchased, and that BRIAN HYNES acted as SOLIS's attorney in connection with the purchase of the business. However, SOLIS has indicated that he no longer has a financial interest in the business. Specifically, on or about April 14, 2015, at approximately 5:23 p.m. (Session #8863), SOLIS received an incoming call on **Target Phone 2** from LATSKO. During the call, SOLIS explained his previous ownership interest in the business: "Actually, I'm the one that invested the first money in it, Brian was my attorney, so I had control. Then I gave it all to my daughter and [first name of Marisol's former business partner]." However, during recent interceptions, no statements have been made indicating that HYNES is acting as an attorney for SOLIS in connection with the business dispute involving Marisol Solis.

to Marisol Solis. During the call, SOLIS and Marisol Solis discussed her business dispute. SOLIS explained to Marisol Solis that she had a position of advantage due to SOLIS's plans with LATSKO to rent the space where the dance studio operated: "You, I really think Sol that, ah, I mean, I don't, I think you're really in a good position. They can do all kinds of stuff that they want but as soon as you hit 'em where they don't have a studio, they're gonna come back crawling and saying: 'How can we work things out?'" SOLIS explained that Marisol Solis could negotiate a resolution with her business partners, and then let them discover afterwards that they no longer had a space to operate their business: "Let's say you negotiate, Sol. Instead of \$60,000 or whatever your amount is, you cut it in half. Or you cut it to a third, alright? Bear with me. So instead of sixty, let's say it's twenty and in exchange for the twenty you keep the no-compete out; you can compete anywhere you want. Alright?" SOLIS continued on: "So once you get that--and even if it's only for like \$20,000, then she thinks she's won. You know, well she's won almost 100%. . . . And then she goes ah, to the ah, the owner and she finds out that she doesn't have that studio, okay? Put yourself in her shoes. What is she going to do then?" SOLIS continued on to explain what Marisol Solis could do at that time: "Yeah, she's gonna reach out to you and you're gonna say: 'Oh yeah, you know what? Well, you're gonna have to pay me 'X' amount, a \$100,000, or you're gonna have to pay me this.' Then you put her on the defensive."

105. On or about August 4, 2015, at approximately 9:09 p.m. (Session #15790), SOLIS received an incoming call on **Target Phone 2** from LATSKO. During the call, LATSKO asked SOLIS whether he should rent a piece of real estate in connection with SOLIS's daughter's business and SOLIS confirmed that he should. Specifically, LATSKO said: "Quick question. Ah, that landlord [the owner of the space where Marisol Solis and her partners operated a dance studio] called me from over in that area, over in your area. Should I call him back and rent the space?" SOLIS instructed LATSKO to rent the space: "Yeah, yeah. Cause, ah, they, they ah, they [Marisol Solis and her former partners] settled and they're breaking apart and I think it'd be a good idea." LATSKO said: "Okay. He called me so I just wanna make sure I'm still going forward. Okay." As the call continued, LATSKO asked, "Oh, Brian's [HYNES] telling you, Brian's working with you on the idea of mine about the, ah, charging for the encroachments?" [I believe LATSKO is referring to an idea he has had that will result in the generation of revenue for the City from real estate holders ("charging for the encroachments").] SOLIS said: "Yeah, yeah. He told me about it last week. Is he still in London or did he get back?" LATSKO said: "No, he got back. He's in, oh that's what I mean to ask him. I didn't know how that went. He's in New York right now."

106. On or about August 6, 2015, at approximately 10:12 p.m. (Session #15931), SOLIS received an incoming call on **Target Phone 2** from Marisol Solis. During the call, SOLIS and Marisol Solis discussed the settlement of a lawsuit between Marisol Solis and her

former partners, and SOLIS informed Marisol Solis that LATSKO was going to rent the property that held the dance studio. Specifically, Marisol Solis asked: "What's going on?" SOLIS said, "What happened with the, um, did you give, ah, [Marisol's attorney], the, the okay to go ahead and deal with [Marisol's former business partner] on the, ah" Marisol Solis said: "We officially, finally today, Pa, um, I settled [the lawsuit] today. Got my check." SOLIS said: "Oh, good. Cause, cause Fred [LATSKO] called yesterday cause, um the landlord had called him and he asked me: 'Should I call him?' I said: 'Yeah, go ahead and do it. They're-' So, go ahead and give [Marisol's former business partner] the information because sh-they'll deal with you." Marisol Solis said: "You said give-Who did you say to give [Marisol's former business partner] information?" SOLIS said: "Wasn't [Marisol's former business partner] holding back with you in terms of the, ah, the landlord and dealing with him, or something? She wanted to" Marisol Solis confirmed: "Yeah. Yeah, she-" SOLIS asked: "Was it? Did she do that?" Marisol Solis said: "No, not yet. We literally just settled today, and we just, I wanted to get my money from her and that's what happened today, finally, and settled." SOLIS said: "Well, cash the [settlement] check before you do anything because it might bounce." Marisol Solis said: "Ah, no. I did. I cashed it today." SOLIS said: "Drop, I mean drop it off in the bank." Marisol Solis said: "Yeah, I did that today." SOLIS said: "Alright, then, ah, okay, so then without you knowing anything [I understand this to be SOLIS directing Marisol Solis to pretend

that she was unaware of SOLIS taking retaliatory action against Marisol Solis's former business partners], let's start doing work." Marisol Solis said: "Um, alright. What else . . . have you? What has Fred said to you?" SOLIS said: "Nothing. That he's gonna return his call and he's gonna rent it for a year." Marisol Solis said: "Okay. So then—" SOLIS said: "Just tell, just tell [first name of Marisol's attorney] to deal with him. Don't, you don't get involved with him." Marisol Solis said: "Okay, okay. I'll call everybody tomorrow morning, then." SOLIS said: "Alright, Mijo. Congratulations on getting your money." Marisol Solis said: "I know. Thank you."

107. On or about August 13, 2015, at approximately 5:04 p.m. (Session #16595), SOLIS received an incoming call on **Target Phone 2** from Marisol Solis. During the call, SOLIS discussed an impending meeting with LATSKO. Specifically, SOLIS advised Marisol Solis that he was going to meet with LATSKO. Marisol Solis said: "Okay, meet with him first. I hope he does still want the space." SOLIS advised that he was going to discuss other matters with LATSKO as well: "I'm also talking to him about, not just about you, but some other stuff too."²¹ Marisol Solis reiterated her hope that LATSKO was still interested in renting the dance studio space: "Okay, alright, well I hope he's still interested in the space." SOLIS replied: "Oh, yeah." I believe that SOLIS planned to meet with LATSKO on or about August 13, 2015, to discuss his direction to LATSKO to rent the space

21 See paragraphs 110 through 112 below, in which SOLIS discussed involving LATSKO in a development plan involving the City of Chicago.

utilized by Marisol Solis's business, and to also discuss involving LATSKO and HYNES in a venture involving the City of Chicago, which SOLIS would be able to influence in his capacity as an Alderman (see paragraphs 110-112 below).

108. Interceptions over **Target Phone 2** reflect that LATSKO ultimately did not enter into a lease for the dance studio property. Although LATSKO remained willing to rent the property, it appears that Marisol Solis was unable to commit to running a dance studio from the property in question in a timely fashion. Specifically, on or about September 11, 2015, at approximately 5:39 p.m. (Session #18645), SOLIS placed an outgoing call on **Target Phone 2** to Marisol Solis. During the call, Marisol Solis reported that her former business partner had entered into another lease for the subject property: "I don't know the last time you spoke with Fred but um I found out that in September or for starting September if not a little sooner that Peter did um renew his lease with [Marisol's former business partner] and I don't know the details of how much or this or that, but um um but I found that out." SOLIS scolded Marisol Solis for being indecisive about her business decisions: "Th, that it's a criticism of you, Mija, is that you gotta be more definitive I mean . . . and and that's something that [Marisol's former business partner] does have is even if she's bullshitting well I'm gonna do that and that's what I'm gonna do you know . . . and and and you have so many more advantages than [Marisol's former business partner] because Juan [GAYTAN] would have got in it as an investor I would

of probably Fred [LATSKO] but you gotta pull the plug you know you . . . just, 'Well maybe I shouldn't be, bad, it's bad karma and this this and that,' what the hell are you talking about?" Later, Marisol Solis expressed her doubt that Fred was interested in renting the property for her. SOLIS assured her that if she had been prepared to run the dance studio business, LATSKO would have rented the property, and the landlord would have rented the property in order to gain favor with SOLIS: "If um, Fred would have done it for you, right, but the other player in this is the owner of the property . . . Now, the the owner of the property would have dropped, dropped this thing whether it had to do with Fred or not because he has other properties that are in my ward that he's interested in doing stuff for, and at some point, he might be call calling me to to do some stuff so, on two levels, one, is he could probably get somebody else to come to that place and maybe even pay more than what [Marisol's former business partner]'s paying with less headache alright, and number two, he would do it because it somehow it's like a, a, an indirect favor that I you know, um."

b. SOLIS Plans to Involve LATSKO in a Potential City Development Project and the Zoning Committee Approves LATSKO's Development Projects.

109. On or about June 26, 2015, at approximately 10:51 a.m. (Session #13874), SOLIS received an incoming call from BRIAN HYNES. During the call, SOLIS asked HYNES to relay a message to LATSKO regarding a recommendation SOLIS made regarding an ordinance that was favorable to LATSKO's interests. SOLIS said: "I met with Judy Frydland. Remember her?" HYNES said: "Yeah, yeah." SOLIS said: "She's the new commissioner for buildings and I really like her." HYNES said: "Right, she is friendly with Fred [LATSKO]." SOLIS said: "Yeah, I, I, I mentioned that to her and then she brought up, remember you asked me to look into the ordinance she was writing?" HYNES said: "Yeah, right. Right, yeah." SOLIS said: "And she goes: 'Well, would you have any-' and I said: 'Cause they did the Kehoe project in my ward.'" HYNES said: "Right." SOLIS said: "And I said, and she said: 'Well, I'm writing this but, uh, what kind of limitations do you think we should-' I says: 'None. We need revenue.'" HYNES said: "Right, right." SOLIS said: "And she liked my response, you know, and she goes: 'Yeah, okay, well then that's how we're going to do it' and says: 'The only person that would be against it is Andrew Mooney [the commissioner of the City's Planning and Development Commission].'" I says: "Fuck Andrew Mooney, you know?" HYNES said: "Ha ha. Good, good, good." SOLIS said: "Yeah, so tell, tell Fred [LATSKO] we had, we had a really good meeting and it will go, it will help him out

with the property that he owns." HYNES said: Okay. Perfect. Perfect. Perfect. Perfect. Perfect."

110. On or about August 12, 2015, at approximately 2:57 p.m. (Session #16417), SOLIS received an incoming call on **Target Phone 2** from BRIAN HYNES, who was using telephone number (787) 510-8005.²² During the call, SOLIS advised HYNES that he wished to meet with HYNES and LATSKO. Specifically, SOLIS indicated he wanted to meet with HYNES: "Well, when you get in, cause I got an interesting proposal that I want you to look over. Maybe you and Fred [LATSKO]." HYNES said: "Okay." SOLIS added: "I think I told you about it. The one where you, um, you would trade off, uh, river PMD [planned manufacturing district] property, um, for, uh, maybe, more inland property that, and then put commercial residential in that river PMD property. And there's a formula for how the city gets the money, the industrial then gets credit, um, the guy came in to see me today. I'm gonna set up a meeting with David Reifman [the new Commissioner of the Department of Planning and Development]. I'd like to talk to you and Fred about it first." [I believe SOLIS is inviting LATSKO and HYNES to meet with him to discuss a potential development project that will require a zoning adjustment for property that is currently

22 During the course of the investigation, interceptions over **Target Phone 2** revealed two telephone numbers for BRIAN HYNES, namely, (787) 510-8005 and (312) 952-8067. According to publicly available information, area code 787 is an area code associated with Puerto Rico, while area code 312 is an area code associated with Chicago, Illinois. Based on the content and context of the intercepted conversations, HYNES used telephone number (787) 510-8005 when he was located in Puerto Rico. Accordingly, I believe that SOLIS, who was located in Illinois at the time of the conversation described above, caused the transmission of an interstate wire communication in connection with his conversation with HYNES.

zoned for industrial use.] HYNES said: "Yeah, no, we'd love to talk about that. Yeah, ah, ah, again hoping tomorrow. Uh, and this is very exciting." HYNES added later: "I know Fred and I spoke before. He wants, we're looking to do stuff. I'd love to do that." [I believe HYNES is telling SOLIS that both HYNES and LATSKO want to become involved in a project involving the City of Chicago.] SOLIS said: "Alright, alright. Let's talk later."

111. On or about August 13, 2015, at approximately 11:21 a.m. (Session #16529), SOLIS placed an outgoing call on **Target Phone 2** to LATSKO. During the call, SOLIS made arrangements to meet LATSKO. Specifically, SOLIS left a voicemail message for LATSKO, in which he asked LATSKO if LATSKO was available for dinner. SOLIS added that if HYNES returned from Puerto Rico, all three of them could meet. SOLIS noted: "I want to show you something that you might find interesting."

112. On or about August 14, 2015, at approximately 5:55 p.m. (Session #16678), SOLIS received an incoming call on **Target Phone 2** from HYNES. During the call, SOLIS discussed assisting LATSKO in identifying business opportunities within his ward. Specifically, SOLIS said: "Yeah, and then the other issue, um, Fred brought up yesterday. He ah, he was trying to ah, you know, you know, he was asking me what I'm going to do, if I'm going to run again [stand in another election], blah, blah, blah. And then he says, why don't you get into real estate. I says, well, I don't know. And then, um, then he was saying you might be interested in getting into som-

the real estate. And I said, well, I, I'll help Brian if he wants to do that, whatever I should do. But that's another—" HYNES interjected: "I have no, I have no interest in getting into real estate. I might, well, we can sit down and talk about it, if it works, it works." SOLIS said: "Yeah. So, he [LATSKO] was interested in my ward and I told him, um, when you get back, maybe he, you, I, and [SOLIS's staff member] can drive through my ward, and I can show you where I think things are going to be, you know, developing and popping." HYNES said: "And, and that's a great ide-, I mean, you know, the thing about Fred, just so you know, ye-, ye-, yeah, he's, he has been paying attention to things, and so, when I talked to him about a week ago, he was like livid. He, he was reading about all these properties all these guys are buying and [unintelligible] . . . Well, everywhere. And he hasn't bought anything. So, he's sitting on hundreds of millions in cash and he hasn't bought anything. So yeah, so he, he, he wants to start doing stuff. So, tha-, tha-, that's perfect timing with him." [I believe HYNES advised SOLIS that LATSKO was ready to make a substantial investment in a real estate project and that SOLIS's idea to take steps to assist LATSKO in such an investment was a good idea.] SOLIS said: "Yeah. Alright, well then ah, I'll—" HYNES said: "Perfect." SOLIS said: "—talk when you get back."

113. Because he is a real estate developer, LATSKO has regularly had business before the City Council and the Zoning, Landmarks & Building Standards Committee, which SOLIS chairs. For example:

- LATSKO was listed as the manager of entities that sought rezoning of 1149 North State Street so that a 25 story building could be built atop the property. The rezoning request was recommended to pass by the Zoning Committee on January 23, 2014, and passed the City Council on February 5, 2014. According to records publicly available on the website of the Office of the City Clerk, SOLIS moved for and voted in favor of this zoning change.
 - LATSKO was listed as the manager of a limited liability company that filed an application to establish a day care center at 1154 West Belmont Avenue. SOLIS's Zoning Committee recommended that the zoning change be approved on December 9, 2014, and the measure passed the City Council on December 10, 2014.
 - LATSKO was the project developer for a 98 unit residential building at 1201 North Clark Street. This development was approved by the City Council on or about January 21, 2015. According to records publicly available on the website of the Office of the City Clerk, SOLIS moved for and voted in favor of this zoning change.
- C. SOLIS's Calls to Solicit Monetary Contributions from Multiple Individuals and Entities with Official Business Pending Before Him and His Agreement to Take Official Action Benefitting Certain of These Contributors.

114. As discussed in greater detail below, SOLIS has actively solicited monetary contributions in calls over **Target Phone 2** that repeatedly coincided with SOLIS's promises in these very same calls to take official action that benefits these financial contributors. As further described below, SOLIS called numerous individuals over **Target Phone 2** seeking monetary contributions in connection with a fundraiser that was held on September 10, 2015, an event which he referred to as the "Taste of the 25th Ward."²³ The individuals from

²³ Although the name of this event implies it may be a neighborhood festival, the interceptions detailed herein reflect that this event

whom SOLIS sought contributions were typically associated with real estate development companies—entities that had business before SOLIS in his official capacity as the Chairman of the City Council's Zoning Committee or were likely to appear before him—as opposed to constituents from within his own Ward who do not regularly have business before him in his official capacity on the Zoning Committee. In addition, with respect to certain of these contributors, SOLIS agreed to take official action for them at or near the time they pledged their financial support. Indeed, SOLIS explicitly promised to steer legal business to one contributor, an attorney, in return for the attorney's pledge to raise money for SOLIS's September 10, 2015 fundraiser.

i. Real Estate Attorney VICTOR REYES

115. On or about August 4, 2015, at approximately 11:25 a.m. (Session #15719), SOLIS received an incoming call on **Target Phone 2** from VICTOR REYES.²⁴ During the call, SOLIS asked REYES for a campaign contribution, and REYES in return asked SOLIS to send him business. Specifically, SOLIS said: "Alright, here, here, here, the, this is the other reason I called. September 10th, Taste of the 25th Ward. Can you raise me some money please?" REYES responded, "Yeah Danny, can I ever, can I, are you ever gonna send me—" SOLIS

was designed to be a fundraiser for SOLIS.

24 According to the internet website, www.rkchicago.com/prof-vicreyes.html, REYES is the majority owner of ReyesKurson, a boutique lobbying and legal practice firm. According to news reports, REYES was a political advisor to former mayor Richard M. Daley and the founder and chairman of the now defunct Hispanic Democratic Organization.

interrupted: "Tell me, tell, well, look, look. The big one you're talking about, is the 63 acres [the Roosevelt Road project]." ²⁵ REYES continued: "How 'bout anything? How 'bout anything, Danny? How 'bout anything? Not just the big one. How about one fucking thing. You know, [26th Ward Alderman Roberto] Maldonado, Maldonado sends me business. [1st Ward Alderman Proco "Joe"] Moreno sends me business, um" SOLIS said: "I will, I will—" REYES said: "[22nd Ward Alderman Ricardo Munoz] Rick Munoz sends me business." SOLIS said: "I will send you business this month." [I believe SOLIS promised to direct individuals with business before the City to REYES as clients in return for REYES's financial support.] REYES continued: "You haven't sent me any. I don't know why." SOLIS said: "You got it." REYES asked: "Are you sending it all to Brian [HYNES]?" SOLIS responded: "No, he doesn't do that kind of shit." REYES said: "I'm just kidding you buddy. Fuck!" SOLIS said: "People that do that are a lot—yeah, yeah." REYES said: "But here's, but here's, but Danny, I'm telling you, I gave you, I, every month, every, at least once a month, they're not, they're small matters but at least once a month George is sending me something. Um, Mal—, Maldonado has sent me three clients for shit in the 26th Ward in just the last three months. The Chairman of the fucking Zoning Committee hasn't sent

25 The Roosevelt Road project is a multi-million dollar development project that concerns a 63 acre parcel of land owned by Nadhmi Auchi, a client of SOLIS's associate, BRIAN HYNES. Publicly available information reflects that this parcel was purchased in 2005 for approximately \$131 million. Interceptions over **Target Phone 2** (including session #16250) reflect that the mayor of Chicago, Rahm Emmanuel, considers this parcel of property to be one of the most valuable pieces of property in the country.

me one." SOLIS said: "You've made your point, you've, I, you've, made your point absolutely right. I'll get to you this month, I promise you. That's a promise." REYES said: "Okay. Alright. What's today? Today's August 4th." SOLIS said: "Yeah." REYES continued: "I'm, I'm, I'm gonna, look I'll tell you what." SOLIS said: "Before, before my event, I'll get you more business than what, what you raise." [I believe SOLIS was telling REYES that he would generate business revenue for REYES that would exceed the total amount REYES contributed to SOLIS for his fundraiser.] REYES said: "I'm focusing on September 10th brother." SOLIS said: "Alright. Alright Vic."

116. According to Illinois State Board of Elections records, Reyes Kurson, contributed \$1,250 to the 25th Ward Regular Democratic Organization on or about March 30, 2013, \$1,500 on September 23, 2013, \$1,000 on April 8, 2014, and \$1,500 on September 21, 2015. The Roosevelt Group, a government relations firm for which REYES is a co-founder according to its website, also contributed \$1,500 to the 25th Ward Regular Democratic Organization on or about September 21, 2015.

ii. Real Estate Broker

117. On or about August 7, 2015, at approximately 2:09 p.m. (Session #16001), SOLIS received an incoming call on **Target Phone 2** from a real estate broker.²⁶ During the call, SOLIS solicited a donation from the real estate broker, who provided SOLIS a donation

²⁶ Publicly available information reflects that the real estate broker operates a Chicago based real estate brokerage business.

larger than requested and then reminded SOLIS that he was in need of SOLIS's official assistance. Specifically, SOLIS referenced his fundraiser, and said: "You've been a good supporter of mine in the past and I'm hoping I might be able to count on you again." The real estate broker asked: "How much you need?" SOLIS said: "Ah, if you could raise me \$1,500, that would be fantastic." The real estate broker said: "No, I cannot. Danny, I'm very very sorry. I cannot give you fifteen hundred but I can give you two thousand." SOLIS said: "Ohhh, well thank you very much. You're the best!" The real estate broker said: "No, don't be silly. You've, you've been great for the city. You've been great for me. I'm still trying to get my sign permit."²⁷ I think we're at the five yard line and I know you've been in the background helping me. I still have a little bit of ways to go but, ah—" SOLIS said: "Yeah, I'll—" The real estate broker said: "Danny, do me a favor. Give me your address where I can send you a check right now." SOLIS said: "You know what? Let me give you my assistant cause she's got all that. Hold on." The real estate broker said: "My pleasure to help you anytime."

118. According to Illinois State Board of Elections records, the real estate broker contributed \$500 to Citizens for Danny Solis on December 19, 2014, and \$1,000 on February 6, 2015. The real estate

²⁷ According to publicly available records, an order was filed for a permit for a sign at a particular address in Chicago associated with the real estate broker. On August 27, 2015, the order was introduced to the Committee on Zoning, Landmarks and Building Standards, which recommended to pass the order. On September 24, 2015, SOLIS motioned to pass the order before the City Council, which approved the order.

broker contributed \$2,000 to the 25th Ward Regular Democratic Organization on or about August 17, 2015.

iii. The Pizzuti Companies

119. On or about August 13, 2015, at approximately 10:49 a.m. (Session #16511), SOLIS placed an outgoing call on **Target Phone 2** to a legislative aide, who was using a telephone located within SOLIS's City Hall office (**Subject Location 1**). During the call, SOLIS asked about an update concerning a development project associated with The Pizzuti Companies and MICHAEL CHIVINI.²⁸ Specifically, SOLIS said: "[first name of legislative aide redacted], what's the story with Mike Chivini and the Pizzuti Company? Where are we at with that, cause I'm gonna call him right now." The legislative aide said: "We're working on that, we're supporting them, um, CDOT—" SOLIS interrupted the conversation to take another call.

120. On or about August 13, 2015, at approximately 10:57 a.m. (Session #16516), SOLIS placed an outgoing call on **Target Phone 2** to a legislative aide, who was using a telephone located within SOLIS's City Hall office (**Subject Location 1**). During the call, SOLIS received additional information concerning The Pizzuti Companies' business before the City. Specifically, the legislative

²⁸ Records maintained by the City of Chicago reflect that on or about July 30, 2014, Pizzuti Development, LLC submitted an application to amend Chicago's Zoning Ordinance to permit the development of residential and commercial space at 1061 West Van Buren. According to the website for The Pizzuti Companies, MICHAEL A. CHIVINI is an executive vice president and leads the company's development operations in Chicago, Indianapolis, and Columbus.

aide said: "Yeah, everything's moving forward with Chivini, they worked everything out with planning [the Planning Department] so that's gonna go. All that's really going on is, um, all that's really going on is CDOT [the Chicago Department of Transportation] and CDOT is, um, CDOT's working with them." Later, the legislative aide added: "So, but we haven't held up anything at all and they haven't asked us for anything recently." SOLIS said: "Okay, good."

121. On or about August 17, 2015, at approximately 3:40 p.m. (Session #16913), SOLIS received an incoming call on **Target Phone 2** from MICHAEL CHIVINI. During the call, SOLIS solicited monetary contributions from CHIVINI and his associates, and agreed to provide a letter of support to CHIVINI at CHIVINI's request. Specifically, SOLIS said: "I am working, making phone calls for my annual fundraiser, um, next month. . . . I'm hoping, uh, you can help out, and maybe with some of the people you do business with. You know, subcontractors, contractors, etc." CHIVINI said: "You know what Danny? By the way, I mean, I actually, uh, candidly, we've contributed to that one in the past." SOLIS said: "Mm-hmm." CHIVINI said: "And, uh, we absolutely will. In fact, I already have the check for uh, we actually were gonna go to 1,500 dollars this year." [CHIVINI's company was going to contribute \$1,500 to SOLIS.] SOLIS said: "Mm-hmm." CHIVINI said: "Um, so, I've got the check, and uh, I was just gonna go ahead and get that over to, I think, uh, Zach." SOLIS said: "Right, Zach."²⁹ CHIVINI said: "Yeah, sure, yeah, no

29 I believe "Zach" is Zach Martin. According to Martin's Linked-In

problem. Yeah, we'll get, I've got the check." SOLIS said: "I'd also appreciate if you could raise me a little bit more from some of the people that you have. You know, some of the contacts that you have." CHIVINI said: "Okay." SOLIS said: "I'd appreciate it. Okay? If you could try to raise like 5,000 that'd be fantastic." CHIVINI said: "Yeah, you know what Danny? I'll go ahead and I'll make some phone calls. We'll do everything that we can." SOLIS said: "I appreciate it." CHIVINI said: "Uh, but I can assure you certainly that our check will probably be over there with Zach this week." SOLIS said: "Alright." CHIVINI then said: "Okay, and then uh, hey, by the way, I'd be remiss if I didn't say I spoke to [first name of SOLIS legislative aide] this morning, and uh, she was just kind of confirming that the same information that we were getting that the folks at DPD [the City's Department of Planning and Development], we've come to an agreement on the, on the DX-7 zoning with them." SOLIS said: "Mm-hmm." CHIVINI said: "And so I think we're good with them. And then, um, um, Bill Higgins, I think, or I forgot the gentleman's name, but Steve Prowsh [phonetic] and there's another gentleman over at CDOT [Chicago Department of Transportation] got back to us last week and they let us know that, uh, they have no more comments on our site plan, um, and we've done, I think, I wanna say

profile and the website for New Chicago Consulting, LLC, Martin is employed by New Chicago Consulting, LLC, as a Finance Associate. Based on calls intercepted over **Target Phone 2**, Martin assisted SOLIS with soliciting campaign contributions, including for the Taste of the 25th Ward.

four out of the five things that the Related³⁰ folks had asked us to do. And I don't know that we're ever really gonna be able to completely satisfy those guys, but the CDOT folks, uhm, and you guys will have to confirm, I think, they feel comfortable with what it is that we want to do by way of the relocation." SOLIS said: "Yeah, I got the same message." CHIVINI said: "Oh, you did? Okay." SOLIS said: "Yeah. I mean, I got it last week, actually, that the CDOT people were okay. So, yeah, I anticipate this thing will get done, and we'll just put the other stuff aside in terms of Related. Cause I think they've got too many other issues that they'll never be happy with." CHIVINI said: "Yeah, I think [first name of SOLIS legislative aide] told me last time around we had shot you guys some drafts of just two quick letters to both DPD and CDOT. So I know that Ed Cuss [phonetic] is sending those over to her. And she said that she would put those on your letterhead and talk to you about signing those, you know, whenever you get back into the office." [I understand this to mean CHIVINI had provided SOLIS's staff member with two letters of support CHIVINI wanted SOLIS to send in support of his project.] SOLIS said: "Okay, no problem." [I understand this to mean SOLIS agreed to provide letters of support to CHIVINI in connection with his pending development project.] CHIVINI said: "So, um, if we could go that route, that would be great then. Okay." SOLIS said: "Okay.

30 Based on the investigation to date and news reports, I believe "Related folks" is in reference to Related Midwest, a real estate developer that is working with Nadhmi Auchi and General Mediterranean Holding to develop the 63-acre Roosevelt Road property referenced above.

Alright, Mike. Thank you for returning my call. And if you can help out with some of your associates, that would be helpful." CHIVINI said: "We'll certainly do everything we can, Danny. And, uh, try to get some time off this week." SOLIS said: "Alright, thank you."

122. According to Illinois State Board of Election records, on September 21, 2015, The Pizzuti Companies made a \$1,500 contribution to the 25th Ward Regular Democratic Organization. The same day, "Pizzuti kts 1033 LLC," a limited liability company associated with The Pizzuti Companies, also made a \$500 contribution to the 25th Ward Regular Democratic Organization.

iv. TSAPARAS and the Nobu Project

123. On July 29, 2015, a hotel development project involving the Nobu Hotel ("the Nobu project") went before the City Council and was passed. Details for the City Council meeting indicate that the project was passed on a motion by SOLIS. SOLIS is also recorded as voting in favor of the project.

124. On or about August 4, 2015, at approximately 11:56 a.m. (Session #15733), SOLIS placed an outgoing call on **Target Phone 2** to SPIRO TSAPARAS, the Chief Executive Officer of Centaur Construction.³¹ During the call, SOLIS and TSAPARAS discussed the Nobu project, SOLIS asked TSAPARAS for a monetary contribution, and

31 Publicly available documents on the internet reflect that TSAPARAS is the CEO of Centaur Construction. Centaur Construction maintains a website at www.centaurco.com. Several news reports published on the internet state that Centaur Construction owns land in Chicago that will be developed into a hotel and restaurant. These reports also state that Nobu Hospitality Group is involved with the project. For example, Crain's Chicago Business published a story on the internet dated June 11, 2014, noting Centaur Construction's ownership of the property and Nobu's involvement with the property.

SOLIS agreed to assist TSAPARAS's brother-in-law in finding a job with the City. Specifically, SOLIS said: "Hi Spiro. How ya doin'? This is Danny Solis." TSAPARAS said: "Hello Danny, how are you?" SOLIS said: "I'm good, I'm good, uh, how's it going with the, uh, hotel [the Nobu project]?" TSAPARAS said: "Uh, it was good to see you the other day there. I had never, uh, seen that process go through and I was feeling proud of you. Uh, pretty cool. It's uh it's a really [sic] thing. I didn't know exactly what that means to have that position, and uh, it was good to see you in action. I was like, yup, that's Danny." [I believe TSAPARAS was indicating that he was present at the Zoning Committee hearing on July 22, 2015, when the Nobu project was considered.] SOLIS said: "I'm surprised you haven't been, to, through that committee before. With all of the developments that you do." TSAPARAS said: "Never. Never. Nope, it's always the attorneys and the architects and so on, and uh, me as the development manager is never in. This is the first time that I have ownership of something of that caliber. Uh, previously I never did. I was always the service provider, and uh, now it's one, I'm kind of one of the first times I'm breaking into the ownership aspect of it." SOLIS said: "Well that's great, that's, congratulations on that. I didn't realize that. This was the first one—" TSAPARAS said: "Yeah, it's the first big one like that. Uh, I was there and I was like ooh, wow, that's cool. This is uh, I mean it's really fantastic. It's wonderful." SOLIS said: "Well, it's, it's been really good the last three or four years because development in the City is starting to

pick up. So we've been really busy in the committee, but, ah, I'm so glad to see you too there at the event because it means that you finally got that, uh, hotel underway." TSAPARAS said: "Yeah, yeah, it's uh, it's like half of what it was but at least it's being done and at least still is, it can make sense and that Nobu said okay. So, that was good." SOLIS said: "Good, good. Anyway Spiro, the reason I'm calling is I'm having my annual Taste of the 25th Ward [fundraiser] in September. I'm hoping you might be able to help out." TSAPARAS said: "I will definitely be there. As always." [I believe TSAPARAS meant that he would support SOLIS.] SOLIS said: "Good, good. Alright, I'm gonna email you." TSAPARAS said: "If I'm not there I will, I will, I will send my, ah, my support, but ah, I always try to be there. Last year I couldn't, but I did send my support." SOLIS said: "I know, I know. . . . I very much appreciate it...." As the call continued, TSAPARAS said: "Danny, since I got you on the phone, and I don't want to bother you otherwise, were you able to look at all at that job position for my brother-in-law? Like I told you, super-qualified. He has a Ph.D. He's worked in the corporate world, large corporate world, in Whirlpool, and Walgreens-" SOLIS said: "Yeah, you know what, Saul, gave, gave me the information, uh, I've got his resume and I think there's other opportunities as the mayor is naming new commissioners for different departments. I'm gonna give it not only to the one that you told me about but I'm also going to open it up to the other commissioners as I meet with them. Especially ones that are under my committee [the Zoning Committee],

for example, um, um, uh, Judy Frydland who's now the commissioner of, um, uh, buildings. I'm also gonna give it to her. And I'll do the same thing with uh, the other, uh, historical landmarks and uh, and zoning. And as you know, um, they're gonna replace, uh, which I'm very--incidentally, privately between you and I--I'm very happy about Andy Mooney [Commissioner of the Department of Planning and Development] resigning." TSAPARAS said: "Yeah, I, I heard it and there was always talk about, uh, there was talk about combining the Zoning and the Building Department under one commission." SOLIS said: "You know what, if that happened under Judy that would be great. But, I, I don't think that's gonna happen. If it is, she would be the perfect one for it cause everybody has such high regard for her." TSAPARAS said: "Yeah, she, she's great. I met her once and she's fantastic." SOLIS said: "You know, we've had really good meetings, she's connecting with me on a lot of ideas that I've got for development. And I'm really happy about her. But I still have uh, your brother-in-law's resume, I, I'll continue to work on it and, and I'll let you know." [I believe SOLIS indicated he would attempt to help TSAPARAS's relative find a suitable job with the City.]

125. According to public filings made by Citizens for Daniel Solis with the Illinois State Board of Elections, on or about December 18, 2014, TSAPARAS made a \$5,000 contribution to Citizens for Daniel Solis. On September 11, 2012, Tsaparas made a \$1,500 contribution to the 25th Ward Regular Democratic Organization. On March 23, 2012, Tsaparas made a \$500 contribution to the 25th Ward Regular Democratic

Organization. On March 30, 2013, September 23, 2013, and October 7, 2013, Tsaparas made \$5,000 contributions on each date to the 25th Ward Regular Democratic Organization.

v. McHugh Construction

126. On September 27, 2014, at approximately 4:04 p.m. (Call #89), SOLIS made an outgoing call on **Target Phone 2** to JUAN GAYTAN. In this call, SOLIS and GAYTAN discussed a construction project being undertaken by McHugh Construction.³² Specifically, GAYTAN asked SOLIS what the "Mayor's people" had told SOLIS about that "p.o. from McHugh Construction about that hotel and stuff." SOLIS replied that "they" wanted him to "hold it" [the approval process for McHugh Construction's hotel project] because "they want to help me out with the woman that's running against me." GAYTAN replied: "These people [McHugh Construction] really want to help you. . . . These guys really want to help you, they're tired of all this B.S., and I told

32 Based on records maintained by the City of Chicago, I believe this project concerned the development of hotel and data center by McHugh Construction that required a zoning change to the land to be used for the project before it could move forward. On or about May 1, 2014, McHugh Construction agreed to pay \$12 million to the United States and the State of Illinois to resolve allegations of disadvantaged business enterprise fraud in connection with specific United States Department of Transportation and Illinois Department of Transportation funded projects. McHugh Construction also agreed to the appointment of a monitor for a period of three years and to take other remedial action in order to prevent the company from being barred from entry into future government contracts. Based on records supplied by McHugh Construction and interviews with McHugh Construction's suppliers during the course of this investigation, I know that McHugh Construction regularly purchases goods and services in interstate commerce. Additionally, according to a review of McHugh Construction's website, McHugh Construction is involved in construction projects in Illinois, California and Texas. Based on this interstate activity, I have further reason to believe that McHugh Construction is engaged in the purchase of goods and services in interstate commerce.

'em what was going on, and they're like: 'We'll back this guy big time, so.'" [I believe GAYTAN was telling SOLIS that individuals associated with McHugh Construction were attempting to obtain official approval of their hotel construction project and had indicated, through GAYTAN, that they were willing to give financial support to SOLIS ("back this guy big time") in return for his assistance in obtaining approval for the project.] The two men agreed to talk later.

127. On September 29, 2014, at approximately 5:50 p.m. (Call #219), SOLIS made an outgoing call on **Target Phone 2** to GAYTAN. During this call, SOLIS and GAYTAN discussed McHugh Construction's project. Specifically, GAYTAN advised that "the guy" [which I believe to be a reference to an individual associated with McHugh Construction] had texted him (GAYTAN) and was trying to get ahold of GAYTAN. SOLIS instructed GAYTAN to text "the guy" back and tell him that SOLIS would call a special meeting before the City Council if an agreement was reached concerning the project. GAYTAN replied that he (GAYTAN) would make it appear that SOLIS was "the guy who's helping them [McHugh Construction] out all the way." SOLIS replied: "Alright." GAYTAN added that "he's going to be very aggressive to help us." Based on GAYTAN's use of vague language, including his frequent use of the term "the guy" to refer to his point of contact with McHugh Construction and his non-specific references to receiving "big time" backing in a prior call and the support being "very aggressive," together with the investigation to date, I

believe GAYTAN was explaining to SOLIS that he (GAYTAN) was attempting to leave the impression with representatives of McHugh Construction that SOLIS was taking official action to aid McHugh Construction's project and anticipated extracting financial support from McHugh Construction in return for this purported action.

128. According to filings for Citizens for Danny Solis with the Illinois State Board of Elections, on September 29, 2014—the very same day that (i) GAYTAN discussed his receipt of a text message from “the guy” associated with McHugh Construction; (ii) GAYTAN told SOLIS he (GAYTAN) would make McHugh Construction think SOLIS was helping out McHugh Construction “all the way” concerning the company's hotel and data center project; and (iii) SOLIS advised GAYTAN to tell McHugh Construction that he would call a special meeting before City Council for the benefit of McHugh Construction—McHugh Construction made a \$1,500 contribution to Citizens for Danny Solis.

129. On or about October 7, 2014, at approximately 9:21 a.m. (Call #941), SOLIS received an incoming call on **Target Phone 2** from GAYTAN. During the call, GAYTAN advised SOLIS that individuals from McHugh Construction would continue to back SOLIS. Specifically, GAYTAN asked SOLIS: “Have you started to do any meetings yet with anyone for your campaign yet, Dan?” SOLIS indicated he had, and then GAYTAN said: “Well, these guys from ah, the guys that I’ve been telling you about, the ones from that hotel deal, they want to start figuring out how to help out” GAYTAN indicated “they” [which

I believe to be a reference to representatives of McHugh Construction] were "so happy" about SOLIS's quote in the "Tribune" that "it [McHugh Construction's project] was held up because of union negotiations."³³ GAYTAN added that SOLIS had "really helped them out big time, so if you see this guy today, just make sure you take credit for that okay? He may bring that up to you today if he grabs you on the--today's your hearing right?" SOLIS confirmed there was a hearing scheduled for 2:00.³⁴ GAYTAN added that "if the guys from McHugh want to talk to you on the side at the end, just make sure you know, 'Hey, yeah, you've talked to Juan,' because I want you to get, uh, they're going to help out a lot, so I just want to make sure you get credit for that quote in the Tribune, because it helped them with all of their board members" Based on the foregoing, I believe GAYTAN led McHugh Construction to believe that SOLIS was taking actions to benefit McHugh Construction in connection with

33 On or about October 7, 2014, the *Chicago Tribune* published a story that noted that "McHugh Construction will present plans to the City Council Zoning Committee to build a 500-room hotel and adjacent six-story data center near Cermak Road and Indiana Avenue." The article further noted that "The hotel project was yanked from the Zoning Committee agenda last week. The committee's chairman, Ald. Danny Solis, 25th, said the removal came at the request of South Loop Ald. Pat Dowell because negotiations were ongoing between Unite Here Local 1 and [Company 5] over the union's ability to organize at the proposed hotel."

34 According to records maintained by the City of Chicago, the Committee on Zoning, Landmarks and Building Standards had a meeting scheduled for October 7, 2014, at 2:00 p.m. The sole item on the agenda for this meeting was consideration of a change of zoning in connection with the property located at 2207-2215 South Michigan Avenue, 101-133 East Cermak Road, 2206-2258 South Indiana Avenue and 118-132 East 23rd Street. McHugh Construction was listed as one of the owners of the property along with two other entities. The stated purpose of the change was "to allow construction of a hotel and data storage center."

their hotel/data center development project, and GAYTAN explained to SOLIS that McHugh Construction wished to provide financial backing to SOLIS in return for his actions. Later in the conversation, GAYTAN added: "And don't forget today, when you see this guy, Mike Meagher from ah, from McHugh, just take credit for whatever he says you did." SOLIS replied: "Alright, alright."

130. Approximately one month later, on November 10, 2014, at approximately 7:43 p.m. (Call #4124), SOLIS received an incoming call on **Target Phone 2** from GAYTAN. During the call, the men discussed a fundraiser for SOLIS. Specifically, SOLIS told GAYTAN he would be receiving a call from a fundraiser on behalf of SOLIS: "she wants to know other than Wintrust who it is, how much, so we can get ready to organize it." GAYTAN replied: "Okay. Sure, it'll, it'll be Wintrust and the guys from McHugh Construction, Danny."

131. On November 19, 2014, at approximately 11:04 a.m. (Session #4764), SOLIS sent an outgoing text message on **Target Phone 2** to GAYTAN. The message was as follows: "Hey Juan, [name redacted] will be calling u abt wind trust and Walsh [Construction] fundraising. She is my fundraiser[.]" I believe SOLIS was attempting to make good on McHugh Construction's willingness to back him financially. While this text messages referenced "Walsh," I believe SOLIS intended to refer to McHugh Construction for several reasons, including the fact that McHugh Construction was referenced by GAYTAN in Call #4124 in connection with a fundraiser. Walsh Construction is also the name of a construction company operating in the Chicago area, and it is

believed SOLIS merely used the wrong name to refer to McHugh Construction.

vi. Elgin Sweeping.

132. As discussed in paragraphs 55 through 90 above, SOLIS assisted Elgin Sweeping in obtaining an exemption from a water ordinance that would have required Elgin Sweeping to pay a significant amount of revenue to the City of Chicago. Further, as noted in paragraph 86, after SOLIS discussed how he had taken this official action to assist Elgin Sweeping, SOLIS told ROBERTO CALDERO that he hoped the President of Elgin Sweeping, Chris Cacciatore, would "remember" SOLIS's assistance, and then discussed the amount of money that CALDERO would raise for SOLIS from Chris Cacciatore and his relatives. As noted in paragraph 90, SOLIS subsequently received a campaign contribution of \$5,400 from Jos. Cacciatore and Co. on or about September 21, 2015. Elgin Sweeping previously donated \$2,500 to Citizens for Danny Solis on or about September 29, 2014.

D. Documents Concerning Potential Contributors and Attendees at the Fundraiser and the Official Action Sought by Them.

133. Based on intercepted calls, I believe that a legislative aide who works in SOLIS's City Hall office, **Subject Location 1**, prepared and maintained a list of individuals/entities that SOLIS would seek contributions from, together with corresponding information concerning the official action each contributor sought from SOLIS.

134. For example, on or about July 27, 2015, at approximately 2:45 p.m. (Session #14981), SOLIS received an incoming call on **Target Phone 2** from a legislative aide, who was using a telephone located within SOLIS's City Hall office (**Subject Location 1**). During the call, SOLIS discussed his plans to call an individual for a contribution. Specifically, SOLIS said: "On the Michigan Group, who are the, who is the guy that a, we're doing the Carmichael for [unintelligible], I forget the name." The legislative aide said: "That's going to be, that's Tom Meador. I didn't know if you wanted to hit him up yet, um, just 'cause there's like, 'cause we haven't settled the deal yet, or how you wanted to treat that one, so I haven't put him on the list yet. But his name is Tom Meador, M-E-A-D-E-R, D-O-R." [I believe the legislative aide told SOLIS that he might not want to solicit a contribution from Meador yet because SOLIS had not yet completed official action on a matter involving Meador.³⁵] SOLIS said: "Then his name is not here, it's, the names I got here are—oh yeah, Tom Meador." The legislative aide said: "And Tom Moore, Tom Moore is the attorney." SOLIS shortly thereafter said: "They should be smart enough to figure out how they can give me a contribution, you know, not necessarily connecting with them, so I'm just going to tell them." [I believe that SOLIS was explaining to the legislative aide that Meador should be able to structure his

³⁵ Based on information maintained by the City of Chicago, I believe Meador is associated with the Michigan Avenue Real Estate Group, an entity that was seeking a zoning change from the City of Chicago in order to build two four-story residential buildings (the "Michigan Group project").

contribution so as to prevent any association being drawn between the donation and SOLIS's official acts benefitting Meador.] The legislative aide said: "Yeah, absolutely, I'm sure. He's, they're, the, he's got like 25 LLCs." SOLIS said: "And the event won't be until September 10th." SOLIS also asked the legislative aide to provide him, in connection with his fundraising, with information about what official acts each party that would be contacted had asked SOLIS to take: "What I need in addition to that information, is what is it that they are asking for, or what is it that they want me to do-oh." The legislative aide said: "That's what I put-" SOLIS said: "Oh, okay, I got it, you did, you did that." The legislative aide said: "Okay, yeah, I have been doing that just to refresh your memory." SOLIS said: "Okay, alright, bye."

135. On or about September 10, 2015, at approximately 2:14 p.m. (Session #18553), SOLIS placed an outgoing call on **Target Phone 2** to his fundraiser. During the call, the fundraiser told SOLIS that she wanted to check in about that night, in reference to SOLIS's Taste of the 25th Ward fundraising event, and also about the next Wednesday. SOLIS informed the fundraiser that he just had lunch with BRIAN HYNES, who said he sent an email out to his network and would follow up with calls, in reference to soliciting donations. SOLIS and the fundraiser then discussed who was going to attend SOLIS's fundraising event that night, and the fundraiser informed SOLIS that the mayor would not be there. The fundraiser informed SOLIS that she would

send SOLIS's scheduler, who worked at **Subject Location 1**, "the list," in reference to the attendees.

E. SOLIS Makes Personal Use of Monetary Contributions Made to Him, to Include Use for the Payment of His Son's School Tuition.

136. Law enforcement officers have obtained financial records concerning the use of a credit card account in the name of the "25 Ward Reg Dem Org," in reference to the 25th Ward Regular Democratic Organization (the "Ward Credit Card Account"). Statements for the Ward Credit Card Account reflect that there are at least three authorized users associated with the account, SOLIS, GRACE PERALES and Robert Klunk. Interceptions over **Target Phone 2** confirm that GRACE PERALES is SOLIS's sister, and that Klunk works in some capacity for Solis.³⁶ These financial records further reflect that the credit cards issued in SOLIS's and PERALES's names have been used over a period of several years to purchase items and obtain services that appear to be personal in nature. For example, the credit card statements reflect the following activity:

- On or about December 24, 2009, the credit card issued in SOLIS's name was used to make a payment of \$100 to Mario Tricoci Hair S[alon];
- On or about April 5, 2010, the credit card issued in SOLIS's name was used to make a payment of \$246.38 in connection with an eye exam;
- On or about November 14, 2010, the credit card issued in PERALES's name was used to make a payment of \$70.96 to J.C. Penney for "toddler separate infant sleepwear girls playwear";

³⁶ A review of publicly available sources on the internet reflects that Klunk is identified in the City of Chicago's employee directory as a "committee secretary."

- On or about September 5, 2011, the credit card issued in PERALES's name was used to make a payment of \$404.80 to Babies R Us for "childrens clothing extended payment option";
- On or about October 25, 2011, the credit card issued in SOLIS's name was used to make a payment of \$2,567 to an orthodontist;
- On or about September 30, 2012, the credit card issued in PERALES's name was used to make a payment of \$156.24 to Mario Tricoci Hair Salon;
- On or about November 4, 2012, the credit card issued in SOLIS's name was used to make a payment of \$180.68 to Macy's for multiple items, including an item described as "boys 8-20 Polo";
- On or about May 19, 2013, the credit card issued in SOLIS's name was used to make a payment of \$40.31 to Nordstrom for "kids shoes";
- On or about November 25, 2013, the credit card issued in PERALES's name was used to make a payment of \$197 to Mario Tricoci Hair S[alon];
- On or about December 23, 2013, the credit card issued in SOLIS's name was used to make a payment of \$131.08 to Macy's for "cookware";
- On or about March 14, 2014, the credit card issued in PERALES's name was used to make a payment of \$299 to Le Petite Skin Boutique; and
- In 2014, the credit card issued in SOLIS's name was used to make payments totaling \$12,510.70 to The Frances Xavier Warde School, in monthly increments of \$1,185. Based on publicly available information on the internet, The Frances Xavier Warde School is an elementary school located in downtown Chicago. Further, based on the investigation to date, including wire interceptions over **Target Phone 2**, it is known that SOLIS's son attended The Frances Xavier Warde School in 2014 and 2015. Based on the recurring nature of these payments and evidence indicating that SOLIS's son attended this school, I believe SOLIS used his credit card to make payments relating to his son's education.

137. Financial records obtained during the investigation further reflect that all payments made for credit card charges incurred on the Ward Credit Card Account by SOLIS and PERALES were made from a bank account held in the name of the 25th Ward Regular Democratic Organization at J.P. Morgan Chase Bank (the "Ward Bank Account"). A review of documents associated with the opening of the Ward Bank Account (the account was opened August 10, 2006) reflect that the two authorized signatories appearing on the signature card are SOLIS and PERALES. A review of deposit activity for the Ward Bank Account reflects the deposit of numerous checks into the account, many of which bear a note indicating that they are contributions.³⁷

37 Bank records obtained during the investigation reflect that Solis has made three deposits totaling \$35,000 into the Ward Bank Account, which were accompanied by notations as follows: (1) 2/17/2011: \$15,000 (notation: loan); (2) 6/4/2012: \$15,000 (notation: loan repayment); and (3) 4/10/2013: \$5,000 (notation: loan repayment). With respect to the second deposit, the records reflect a deposit of \$15,000 from the Ward Bank Account into Solis's personal bank account on April 19, 2012. Subsequently, on May 2, 2012, a payment of \$15,809 was made from Solis's personal bank account to the Internal Revenue Service. Accordingly, it is believed that the second deposit is a repayment of a loan taken to pay the IRS. With respect to the third deposit, the records reflect a deposit of \$5,000 from the Ward Bank Account into Solis's personal bank account on or about December 18, 2012. Subsequently, on or about December 21, 2012, Solis wrote a \$5,000 check off his personal account to Paleo Fit Meals. Accordingly, it is believed that the third deposit is a repayment of a loan taken to make a purchase from Paleo Fit Meals. At this point based on the bank records available to the government, no correlation has been drawn between the 2/17/2011 deposit and a prior loan. It appears from various bank records that the 2/17/2011 deposit is derived from a \$30,000 payment that was deposited into an account in the name of Solis Enterprises on or about 2/7/2011. This money originated from the Chicago Real Estate Consulting Group. Records maintained by the Illinois Secretary of State reflect that BRIAN HYNES is the registered agent for the Chicago Real Estate Consulting Group. Based on the investigation to date, HYNES has extended various personal benefits to Solis in 2014 and 2015, and

138. Based on the foregoing, I believe SOLIS is utilizing funds from 25th Ward Regular Democratic Organization to pay for his personal expenses.

F. SOLIS's False Exculpatory Statements.

139. As set forth below, during the course of an in-person meeting with CS-1 and interceptions over **Target Phone 2**, SOLIS, at times, made reference to his unwillingness to conduct illegal activity. As discussed below, I believe these statements are pretextual, as they have occurred during the course of the criminal conduct discussed above. Moreover, they often occurred with or in the context of individuals about whom SOLIS expressed distrust and, accordingly, an unwillingness to engage in criminal activity with them.

140. For example, on or about October 17, 2014, SOLIS met privately with CS-1 and Businessman 2, a Chinese businessman and property developer. During this meeting, SOLIS, CS-1 and Businessman 2 discussed Businessman 2's relationship with SOLIS's former girlfriend. A former member of SOLIS's staff acted as an English translator for Businessman 2 during the meeting. SOLIS claimed during the conversation that his former girlfriend had told SOLIS that she had not been paid by Businessman 2. SOLIS also indicated during the

HYNES also represents Nadhmi Auchy in a real estate development matter that Solis has taken action on in an official capacity, namely, the Roosevelt Road project. After this deposit was made, a \$15,000 check from Solis Enterprises was deposited into Solis's personal bank account on or about 2/16/2011. Solis then made the 2/17/2011 deposit into the Ward Bank Account. Based on the financial analysis conducted to date, expenditures on personal items are well in excess of \$15,000.

conversation that he was worried that he was "going to be doing something illegal." SOLIS also noted during the conversation that SOLIS did not want anything to do with his former girlfriend and another individual. Businessman 2 informed SOLIS that Businessman 2 had paid \$100,000 to SOLIS's former girlfriend. SOLIS responded: "Wow." SOLIS explained that he understood his former girlfriend was "selling access to me, that she would bring people to me. And that is true because she was my girlfriend, but I didn't know whether she was being paid. She told me nobody was paying her anything." SOLIS explained that it was "very common" for such payments to occur (and that CS-1 had paid SOLIS's ex-chief of staff) but that such payments had to be disclosed publicly: "So that happens a lot, not just me, with everybody, but you can't lie about it."³⁸

38 According to CS-1, in 2010, CS-1 and Businessman 2 invited SOLIS and others to Shanghai, China to attend a world expo event, and SOLIS attended this event. Businessman 2 told CS-1 that during this event, it was communicated to SOLIS that Businessman 2 wanted SOLIS's support for Businessman 2's purchase of a vacant lot owned by the City of Chicago (the Vacant Lot). Businessman 2 advised CS-1 that he paid cash to SOLIS on two separate occasions; based on CS-1's conversations with Businessman 2, CS-1 understood these cash payments to SOLIS were made in exchange for SOLIS's support of Businessman 2's acquisition of the Vacant Lot. One of the cash payments was made to SOLIS during SOLIS's trip to Shanghai, China in 2010. The other cash payment was made to SOLIS in a coffee shop in Chicago. Records maintained by the federal government reflect that SOLIS arrived in the United States on May 4, 2010, from Shanghai, China.

CS-1 provided law enforcement with a copy of an email he sent to SOLIS at the email address dan410@mac.com. In the email, which was dated May 9, 2010, CS-1 asked SOLIS: "Danny, how's your trip in Shanghai? Welcome back to Chicago." CS-1 went on to request SOLIS's assistance in obtaining a liquor license for a restaurant. SOLIS replied to the email on May 10, 2010. With respect to his trip to China, SOLIS wrote: "ps the trip was very good in understanding the potential for development in Chicago [sic] w/ investment from China, specifically [sic] [Businessman 2]."

141. In an in-person, consensually-recorded meeting with CS-1 that occurred on January 28, 2015, SOLIS again expressed distrust of his former girlfriend. Specifically, SOLIS asked CS-1 to relay to certain Chinese businessmen that he was having his fundraiser and that he needed "as much support as they can give me." In response, CS-1 said regarding Businessman 2's project, "I'm sure he will support you if you support him." SOLIS responded, "Everything has to be legal . . . I don't want anything like what he was doing with [first name of SOLIS's former girlfriend]." CS-1 said: "No, no. This is legitimate because he just want to . . . ultimately, I think he wants to hotel...." SOLIS then said: "No, what I mean is,

According to CS-1, SOLIS's (now) former girlfriend accompanied SOLIS on his trip to China in May 2010. CS-1 advised that approximately two to three years ago, Businessman 2 hired SOLIS's (now) former girlfriend to facilitate the acquisition of the Vacant Lot because Businessman 2 knew of the former girlfriend's relationship with SOLIS, and Businessman 2 believed the (now) former girlfriend could use her relationship with SOLIS to help successfully obtain a letter of support from SOLIS in connection with Businessman 2's attempted purchase of the Vacant Lot.

According to CS-1, Businessman 2 advised CS-1 that SOLIS's former girlfriend ultimately complained to Businessman 2 that she had not received the necessary information to facilitate the purchase of the Vacant Lot, and that Businessman 2 was not paying her in a timely fashion for her role as a facilitator. SOLIS's former girlfriend therefore withdrew Businessman 2's bid to purchase the Vacant Lot. CS-1 advised that when Businessman 2 found out his bid to purchase the Vacant Lot had been withdrawn, he was furious. However, according to CS-1, Businessman 2 did not seek the return of the cash payments he had made to SOLIS because Businessman 2 believed SOLIS would "owe him" for something in the future.

According to CS-1, during a different in-person meeting with SOLIS and Businessman 1, Businessman 1 offered SOLIS a pearl necklace as a gift. (This offer was not made at law enforcement direction or with law enforcement's knowledge.) SOLIS declined to accept this gift, and explained he could only receive gifts valued less than fifty dollars.

according to what I hear, [SOLIS's former girlfriend] was asking for money and I don't know what the hell she was doing." In response, CS-1 told SOLIS that was in the past.

142. On or about May 21, 2015, at approximately 12:16 p.m. (Session #11518), SOLIS made an outgoing call on **Target Phone 2**. During the call, SOLIS warned a female about his former girlfriend. Specifically, SOLIS advised the female that no one should talk to SOLIS's former girlfriend about matters concerning SOLIS: "And there's absolutely no reason why anybody should be calling [first name of former girlfriend] on issues or business that involves me. I don't trust that lady at all." SOLIS explained his concerns: "What really got me concerned is I heard one time from somebody that's close to [first name of former girlfriend], that she was saying she was in on the deal with the hotel. That her and I were partners in that deal. And that's absolutely, not only it's not true, I could not do that. That is illegal."

143. On or about May 29, 2015, at approximately 2:22 p.m. (Session #12091), SOLIS made an outgoing call on **Target Phone 2** to a prospective consultant. During the call, SOLIS assauged the prospective consultant's concerns relating to potential illegal activity. Specifically, SOLIS said: "Hey, listen, I was thinking about our conversation this morning. . . . I was just, wanted to make, uh, uhm, something clear to you, cause I think you might have misunderstood. . . . I would, if, uhm, I think you could, uh, do very well in the role I was telling you in terms of being a consultant,

uh, for some these investors that are coming from China." The prospective consultant said: "Yep." SOLIS continued: "But I would never get any compensation for that, either directly or indirectly." The prospective consultant said: "Okay." SOLIS continued: "Because you, I, think when you questioned 'Is this legal?,' I, you know, absolutely, uh, it probably would not be legal, but even if it was legal and, it would be unethical." The prospective consultant said: "Okay." SOLIS continued to note that "I get compensation for stuff I do that may be connected in Washington, but not in Chicago." The prospective consultant asked SOLIS what the "next step" was, and SOLIS replied: "Well, you know what? Uh, you mentioned [name redacted]. That's, that's a possibility. The other possibility is maybe, uh, uh, maybe it could also be my sister, Patti [DOYLE]. Or Brian [HYNES], or a combination thereof." SOLIS suggested "a conversation with Brian might, might help," because "he actually has more experience of any of the players we're talking about: me, Patti, uh [name redacted]. Because he's been doing this for a long time. He no longer does it. He's no, no longer a consultant. He was a lobbyist in Springfield. He don't, he doesn't do that anymore. He doesn't do that in Chicago. He has his own business where he's done very well." The prospective consultant said: "Sure." SOLIS continued: "The only reason that the guy from London, uh, hired him, is, is, at my insistence, because I need an attorney I can trust, and, um, that is representing him [Auchi]." The prospective consultant said: "Okay." SOLIS said: "Which, which is the same

reason I'd be interested in you, uh, becoming a, uhm, consultant or lobbyist." I believe SOLIS suggested directing work to the prospective consultant in a conversation earlier in the day that left the prospective consultant with the impression that SOLIS would illegally benefit from this activity. Moreover, I believe SOLIS's claim that he would not do anything illegal is pretextual not only because the prospective consultant was left with the impression that SOLIS was proposing something illegal, but also because, among other things, of prior interceptions in which SOLIS acknowledged that his former girlfriend was hired by individuals to "buy" influence with SOLIS, despite SOLIS's denial of knowledge of such activity to CS-1 and Businessman 2.³⁹

144. On or about June 26, 2015, at approximately 10:51 a.m. (Session #13874), SOLIS received an incoming call on **Target Phone 2** from HYNES. During the call, SOLIS told HYNES about a recent conversation he had with a zoning attorney regarding the Vacant Lot involving CS-1 and Businessman 2. SOLIS informed HYNES that he told the zoning attorney, who represents Businessman 2, that everything needed to be done legally due to the involvement of CS-1 and SOLIS's former girlfriend with the project. Specifically, SOLIS said: "Speaking of developments, [name of zoning attorney] came into to see me this week... About the Canal and Cermak property that...remember [Businessman 2] wanted?" HYNES said: "Yeah, yeah,

³⁹ In a subsequent conversation with the prospective consultant (Session #12357), SOLIS discussed her becoming an employee for the City of Chicago.

yeah, right." SOLIS said: "And then [first name of SOLIS's former girlfriend] tried to give it over to her boyfriend?" HYNES responded, "Right." SOLIS said: "And ah, so now they're, he's back in the picture on it. And..." HYNES interjected, "Who is? The boyfriend or [Businessman 2]? . . . Who is [the zoning attorney] representing?" SOLIS indicated he was representing Businessman 2. HYNES said: "[Businessman 2]. Okay. Fine. Good." SOLIS continued, "And so, um, I told [first name of zoning attorney] the history of it and you know what, and I told [first name of zoning attorney], you know what, [first name of zoning attorney]? Because of this history, I want to make sure everything is on the up and up [done legally]. And so, um... I told him that I was gonna talk to some people in the city and I was going to talk to you because I want to make sure that if I go ahead and do this, it's the, it's the right thing to do and that none of this...because [CS-1], he was involved, involved in both, with both sides. Well, he was involved... with [first name of SOLIS's former girlfriend] and her friends when they tried to recruit [CS-1] to get investors from China to take it away from [Businessman 2] and now when he couldn't raise it, now he's involved with [Businessman 2]. But when [CS-1] was involved with . . . [first name of SOLIS's former girlfriend] and her friends, I had not, you know, I wasn't supporting it. I think [first name of SOLIS's former girlfriend] was just counting that I was going to be able to do it, ah, even though we weren't together or whatever. I don't know...But it just, it looks, it sounds fishy and I'm not sure

I should go along with it and that's why I wanted to talk to you about it." HYNES said: "Okay. No, definitely." SOLIS said: "So, anyway [first name of zoning attorney] will prob...might talk to you about it." HYNES said: "Okay. Yeah, I'll be back on Tuesday."

145. I believe that the various statements referenced above regarding SOLIS's claims that "[e]verything has to be legal;" that he would not do anything illegal; that everything in connection with Businessman 2 and CS-1 needed to be on the "up and up" were pre-textual for a number of reasons. First, SOLIS appears to want to distance himself from any connection to his former girlfriend, particularly in light of Businessman 2's disclosure to SOLIS that Businessman 2 paid SOLIS's former girlfriend \$100,000 in connection with the Vacant Lot. As expressed by SOLIS to HYNES, SOLIS understood that the payment was to buy access to SOLIS, and SOLIS no longer trusts his former girlfriend. Moreover, these statements occurred while, among other things: (i) SOLIS promised to take official action in return for the retention of MADIGAN's firm by Businessman 1; (ii) information provided by CS-1 that Businessman 2 gave SOLIS two cash payments in exchange for SOLIS's support of Businessman 2's acquisition of the Vacant Lot; (iii) the steady flow of benefits that SOLIS received while taking official actions for the benefit of the individuals providing him the benefits; and (iv) the connections SOLIS made between his requests and receipt of campaign contributions and the official actions that he took or was willing to take on behalf of the contributors.

G. The Subject Premises

146. With regard to Subject Location 1, Subject Location 2, Subject Location 3, Subject Location 4, Subject Location 5, and Target Phone 2 and based on my training and experience in fraud and public corruption investigations, I believe that public officials, such as SOLIS, maintain various records, in both paper and electronic format, within their offices, places of business, residences, and telephones, including the following:

a. Campaign financial records including financial donations, in-kind contributions and expenditure records, reports, ledgers and receipts;

b. Information related to fundraising activities including advertisements, photographs, invitations, letters or records of contributors and/or attendees at fundraising events;

c. Lists, spreadsheets or other records of potential or actual campaign contributors including, but not limited to, contributors with potential matters before the Chicago City Council or a representative body or committee thereof;

d. Calendars, schedules and communications of staff members;

e. Letters and correspondence concerning matters which have appeared or may likely appear before the Chicago City Council or a representative body or committee thereof, including the Zoning Committee, as well as actions taken on these matters;

f. Credit card statements, bills, payment records/ledgers or receipts;

g. Employee payment records, to include IRS reporting documents such as forms 1099 or W2;

h. proof of occupancy, such as utility and telephone bills, mail envelopes, or addressed correspondence, which in turn demonstrates possession, control and association with other evidence relevant to the investigation;

i. Computers, electronic devices and removable media storage devices which may contain information related to the above items.

i. Subject Location 1

147. As further described in Attachment A-1, **Subject Location 1** is SOLIS's City Hall office. On March 8, 2016, CS-1 visited SOLIS's office at **Subject Location 1** at the direction of the FBI. CS-1 was equipped with concealed video and audio recorders. According to CS-1 and as observed on the video, **Subject Location 1** is behind a door that states "Committee on Zoning." **Subject Location 1** bears SOLIS's name and office number, 304. According to CS-1 and as observed on the video, CS-1 entered **Subject Location 1** and spoke with a legislative aide and an unknown woman, who were located inside **Subject Location 1**.

148. As discussed herein, SOLIS is the Chairman of the City Council's Zoning, Landmarks & Building Standards Committee. Furthermore, SOLIS has agreed to take official action on multiple

occasions with respect to matters pending before the Zoning Committee and elsewhere. Owing to his chairmanship of the Zoning Committee, and his participation in the affairs of the City Council, it is reasonable to believe that SOLIS maintains within his City Hall office documents relating to development projects that will be heard and have been heard by the Zoning Committee, including those projects that are discussed in this affidavit. SOLIS's possession of documents with respect to those projects on which he has agreed to take or has taken official action on is itself proof of his participation in the **Subject Offenses** under investigation.

149. Based on their use of telephones located within **Subject Location 1**, as well as a review of public records, I have identified City of Chicago employees who work as a part of SOLIS's staff within **Subject Location 1**. As noted on multiple occasions herein, SOLIS has maintained contact with these employees (including his legislative aides) for the purpose of obtaining information concerning the progress of pending projects, to direct the operation of his office and to obtain information about his schedule.

150. In addition, based on intercepted conversations, including the intercepted conversation set forth in paragraph 134, I believe a legislative aide prepared, maintained and/or received lists of individuals and entities for whom SOLIS wished to receive a monetary contribution from, as well as the official action that these contributors wished SOLIS to take. It is therefore reasonable to believe that copies of these lists, as well as information

concerning contributors, the benefits they and others have conferred on SOLIS, and official action taken or to be taken on their behalf will be found within **Subject Location 1**.

151. Additionally, as set forth above, legislative aides to SOLIS have scheduled meetings with individuals, including the Water Commissioner, and handled requests from individuals, such as CALDERO. It is therefore reasonable to believe that information relating to these requests will be found within **Subject Location 1**.

ii. Subject Location 2

152. As further described in Attachment B-1, **Subject Location 2** is SOLIS's 25th Ward constituent service office. According to the website ward25.com, SOLIS's 25th Ward constituent service office is located at 1800 South Blue Island. During recent surveillance on March 1, 2016, however, surveillance observed that SOLIS's 25th Ward office was located at **Subject Location 2**, as shown on Attachment B-1.

153. According to a Statement of Economic Interests filed by SOLIS with the Cook County Clerk on or about May 1, 2015 and on May 2, 2016, SOLIS identified the 25th Ward Regular Democratic Organization as a political organization with which he was involved and from which income in excess of \$1,200 was derived during the preceding year. SOLIS identified **Subject Location 2** as the address of 25th Ward Regular Democratic Organization in his Statement of Economic Interests filed on May 2, 2016. According to a Statement of Financial Interests filed by SOLIS with the City of Chicago on or about May 12, 2015, SOLIS also identified the 25th Ward Regular

Democratic Organization as a political organization with which he was involved and from which he receives income in excess of \$1,000 the preceding year. SOLIS identified **Subject Location 2** as the address of the 25th Ward Regular Democratic Organization.

154. As noted above, the 25th Ward Regular Democratic Organization has made regular reports to the Illinois State Board of Elections concerning monetary contributions received by the 25th Ward Regular Democratic Organization. Under law, reporting entities such as the 25th Ward Regular Democratic Organization are required to maintain, for two years, records concerning (1) the total contributions made to or for the committee, (2) the full name and mailing address of every person making a contribution and the date and amount thereof, (3) the total expenditures by or on behalf of the committee, (4) the full name and mailing address of every person to whom any expenditure is made, and the date and amount thereof; and (5) proof of payment, stating the particulars, for every expenditure made by or on behalf of the committee. I therefore believe that documents detailing the amounts of money and other benefits received by Solis and the organization, the identity of contributors, and the timing of the receipt of such contributions and benefits will be found within **Subject Location 2**, together with the other items specified in paragraph 146 above.

155. In addition, as noted in paragraphs 136 through 138, there is reason to believe that SOLIS has taken funds from the bank account used by the 25th Ward Regular Democratic Organization for his

personal use. It is reasonable to believe that the 25th Ward Regular Democratic Organization will maintain records concerning legitimate expenses incurred by the organization in the carrying on of its political activities. This information is relevant to this investigation, because these records will tend to establish what are permissible expenditures (and the reasons for those permissible expenditures) as opposed to the personal expenses of SOLIS and PERALES that have been paid through the use of organization funds.

iii. Subject Location 3

156. As further described in Attachment C-1, **Subject Location 3** is SOLIS's personal residence. The residence is identified by the number "522" affixed to the wall adjacent to the door. According to utility records received on or about April 19, 2016, SOLIS is identified as the resident of record for **Subject Location 3**. According to Illinois Secretary of State records, **Subject Location 3** is identified as SOLIS's residence. On April 25 and 26, 2016, as well as May 11, 2016, surveillance observed the vehicle registered to SOLIS parked in the front turnaround area of the building in which **Subject Location 3** is located.

157. Based on my training and experience, individuals maintain documents regarding their personal finances, loans, and expenditures within their residences, to include (a) books, records, journals or other records of original entry; (b) ledgers and other records of assets, liabilities, or capital account balances; (c) records of income or expenses including invoices and receipts; (d) records of

lessors or lessee; (e) records of receipts or disbursements; (f) accounting information; (g) bank statements, check registers, or canceled checks; (h) duplicate deposit tickets; (i) bank account reconciliations; (j) passbooks, certificates of deposit, money orders, or cashier's or official checks; (k) records of payroll or employee earnings; (l) records of bartering activity such as exchanges of property or services; (m) financial statements or copies of tax returns; and (n) credit card statements, bills, payment records/ledgers or receipts.

158. Records concerning SOLIS's personal finances are relevant to the investigation of the **Subject Offenses** for multiple reasons. Among them are the following. First, as noted earlier in the affidavit, thus far no evidence has been found to demonstrate that SOLIS has paid for the benefits lavished upon him by others. Records documenting expenditures SOLIS has made will allow investigators to determine what items and services SOLIS has paid for, and will also help establish which benefits he has not paid for. Establishing the extent of payments SOLIS has made, and for what items and services, will establish what items and services he has not paid for are connected to an illicit purpose. Second, records concerning SOLIS's personal finances would tend to show his inability to pay for many of the benefits he has received, such as the use of LATSKO's multi-million dollar farm. Third, because individuals typically maintain documents relating to their finances at home, it is reasonable to believe that SOLIS would maintain documents relating

to any loans he received from GARY FEARS, referenced above in footnote 17, at his residence in the event such documents exist. Such documents would demonstrate the terms of the loan and any payments that have been made with respect to the loan. In addition, documents tending to show a lack of formality or memorialization concerning the terms of the loan would tend to demonstrate that this loan was concealed and therefore made for an illicit purpose. Fourth, because individuals typically maintain records concerning their personal expenses at home, it is expected that these documents will be found at **Subject Location 3**, and that these documents will confirm that certain expenditures made by SOLIS using his debit card associated with the 25th Ward Regular Democratic Organization (such as, for example, school tuition expenses) are in fact personal expenses. Finally, it is reasonable to believe that SOLIS will also maintain in his residence documents relating to economic and other benefits he has received, including benefits received from third parties, such as the individuals identified herein who have provided him with benefits.

iv. Subject Location 4

159. As further described in Attachment D-1, **Subject Location 4** is the residence of SOLIS's wife and son and SOLIS's other residence. In his Statement of Financial Interests that he filed with the City of Chicago on May 2, 2016, SOLIS identified **Subject Location 4** as the residence of his wife. On April 25, 2016 at approximately 9:12 a.m., on April 26, 2016 at approximately 9:28 a.m., on May 11, 2016,

at approximately 9:05 a.m., on May 12, 2016, at approximately 8:55 a.m., on May 17, 2016 at approximately 9:00 a.m., on May 25, 2016 at approximately 8:14 a.m., and on May 26, 2016 at approximately 8:28 a.m., FBI surveillance observed a vehicle registered to SOLIS leaving the parking garage at **Subject Location 4**. FBI surveillance observed SOLIS as the driver of this vehicle on April 25, 2016 and May 11, 2016, and on other occasions was not able to positively identify the driver. Although surveillance was unable to determine the driver of these other occasions, no one else other than SOLIS has been observed driving this vehicle during surveillance. With the exception of May 12, May 17 and May 25, FBI surveillance observed the vehicle proceed to **Subject Location 3**. Based on intercepted conversations in July and August of 2015, SOLIS and his wife were working to resolve marital issues and had begun living together again after a period of separation. At the same time, SOLIS continues to maintain his residence at **Subject Location 3**.

160. As discussed above, based on my training and experience, individuals maintain documents regarding their personal finances, loans, and expenditures within their residences. As noted above, the Ward Credit Card Account has been used for expenditures that appear to be associated with SOLIS's family, to include school tuition payments to SOLIS's son's school, payment to an orthodontist, and payments for cookware and children's clothing. Because SOLIS's wife and son live at **Subject Location 4**, it is expected that at **Subject Location 4**, there will be documents confirming that certain

at approximately 9:05 a.m., on May 12, 2016, at approximately 8:55 a.m., on May 17, 2016 at approximately 9:00 a.m., on May 25, 2016 at approximately 8:14 a.m., and on May 26, 2016 at approximately 8:28 a.m., FBI surveillance observed a vehicle registered to SOLIS leaving the parking garage at **Subject Location 4**. FBI surveillance observed SOLIS as the driver of this vehicle on April 25, 2016 and May 11, 2016, and on other occasions was not able to positively identify the driver. Although surveillance was unable to determine the driver of these other occasions, no one else other than SOLIS has been observed driving this vehicle during surveillance. With the exception of May 12, May 17 and May 25, FBI surveillance observed the vehicle proceed to **Subject Location 3**. Based on intercepted conversations in July and August of 2015, SOLIS and his wife were working to resolve marital issues and had begun living together again after a period of separation. At the same time, SOLIS continues to maintain his residence at **Subject Location 3**.

160. As discussed above, based on my training and experience, individuals maintain documents regarding their personal finances, loans, and expenditures within their residences. As noted above, the Ward Credit Card Account has been used for expenditures that appear to be associated with SOLIS's family, to include school tuition payments to SOLIS's son's school, payment to an orthodontist, and payments for cookware and children's clothing. Because SOLIS's wife and son live at **Subject Location 4**, it is expected that at **Subject Location 4**, there will be documents confirming that certain

expenditures by SOLIS associated with the 25th Ward Regular Democratic Organization are, in fact, personal expenditures. Additionally, intercepted conversations suggest that SOLIS and his wife are renting **Subject Location 4**, which suggests that financial documents, including the apartment lease and other records, will be located at this location. For example, on or about March 26, 2015, at approximately 11:55 a.m. (Call #7878), SOLIS placed an outgoing call on **Target Phone 2** to a representative of the property developer behind The Roosevelt Collection, where **Subject Location 4** is located. During the call, the representative informed SOLIS that a two bedroom, two bathroom apartment may become available in July. SOLIS informed the representative that he was looking to rent right now and may purchase a property as an investment later. SOLIS also said that he had a unit in River City (**Subject Location 3**). In another intercepted call on or about June 19, 2015, at approximately 2:41 p.m. (Call #13375), SOLIS placed an outgoing call on **Target Phone 2** to "Roxy" at the Roosevelt Collection. During the call, Roxy informed SOLIS that she had received his application, proof of income, and a copy of his identification in connection with his rental of an apartment at the Roosevelt Collection. During the call, SOLIS informed Roxy that he would arrange to have his bank automatically transfer rent for the apartment on a certain day.

v. **Subject Location 5**

161. As described in Attachment E-1, **Subject Location 5** is the business premises of the Copper Tan and Spa, where SOLIS received

prostitution services, as described above in paragraphs 69 through 75, 88 and 89. Based on surveillance and news reports related to a Chicago Police Department raid on the Copper Tan and Spa, which occurred on or about July 31, 2013, **Subject Location 5** has video surveillance equipment, which may provide evidence of SOLIS's visit, the method of payment for SOLIS's visit, and the identities of the individuals who provided services to SOLIS and his companions.

162. Additionally, according to its website, which is available at www.coppertanspa.com, the business accepts most credit cards. Based on my training and experience, I know that businesses that accept credit cards maintain records of credit card transactions in order to receive payment from the lender for the services rendered. Such businesses often maintain other financial records, including receipts, checks, bank and savings and loan records of deposit, statements and other bank records, credit card statements, money orders, cashier's checks, passbooks, cancelled checks, certificates of deposit, loan records, customer account information, and income and expense summaries.

163. Additionally, businesses such as the Copper Tan and Spa often maintain appointment books, calendars, client lists, details of services rendered, the names of masseuses that a client utilizes, and other records of client visits, services rendered and contact information. All the foregoing information will constitute evidence of visits by SOLIS and his companions to this location.

vi. **Target Phone 2**

164. As further described in Attachment F-1, **Target Phone 2** is the cellular telephone used by SOLIS in the intercepted conversations and text messages discussed above regarding the **Subject Offenses**.

165. Based upon my training and experience, I know that information stored within a cellular phone may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, the information stored within a cell phone can indicate who has used or controlled the cell phone. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. In this case, establishing SOLIS's use of **Target Phone 2** will, among other things, establish his voice identification in wire interceptions made over **Target Phone 2**. In addition, contacts lists, instant messaging logs, and communications (and the data associated with the foregoing, such as date and time) may indicate who used or controlled the cell phone at a relevant time. Further, such stored electronic data can show how and when the cell phone and its related account were accessed or used. Such "timeline" information allows investigators to understand the chronological context of cell phone access, use, and events relating to the crime

under investigation. This "timeline" information may tend to either inculcate or exculpate the cell phone account owner.

166. Cellular phones may contain relevant evidence of the **Subject Offenses**, including text messages made or received from **Target Phone 2** that are located in the memory of **Target Phone 2**, which messages may provide information regarding the identities of, and the methods and means of operation and communication used by, the participants in the **Subject Offenses**. Moreover, digital photographs located in the memory of **Target Phone 2** may contain images of participants involved in the **Subject Offenses**. Moreover, digital photographs stored in **Target Phone 2** may contain images of SOLIS, SOLIS's associates (including persons involved in or knowledgeable about the **Subject Offenses**), places frequented by SOLIS leading up to and during the **Subject Offenses**, and locations and instrumentalities used in committing the **Subject Offenses**.

167. In addition, based on my training and experience, I know that information stored within a cell phone may indicate the geographic location of the cell phone and user at a particular time (e.g., location integrated into an image or video sent via email or text message to include both metadata and the physical location displayed in an image or video). Stored electronic data may also provide relevant insight into the cell phone owner's state of mind as it relates to the offense under investigation. For example, information in the cell phone may indicate the owner's motive and intent to commit a crime (e.g., communications relating to the

crime), or consciousness of guilt (e.g., deleting communications in an effort to conceal them from law enforcement). Unless this data is destroyed, by breaking the cell phone itself or by a program that deletes or over-writes the data contained within the cell phone, such data will remain stored within the cell phone indefinitely.

168. Through experience as a law enforcement officer and through the experience of other law enforcement officers as conveyed to me, I have learned that individuals involved in criminal offenses commonly use cellular telephones as a means to communicate. As detailed above, SOLIS used **Target Phone 2** to communicate with a number of individuals regarding and in connection to the **Subject Offenses**. Individuals involved in criminal offenses also often store telephone numbers and names or nicknames of fellow conspirators on their telephones and the telephones also reflect recent call history. Finally, individuals often use text messaging and digital photographs in furtherance of their criminal activity that are stored on cellular telephones. Because, as explained above, **Target Phone 2** is associated with SOLIS, because there was telephonic communication between participants involved in the **Subject Offenses**, and because, in my experience and in the experience of other agents, defendants use telephones to contact co-conspirators, there is probable cause to believe **Target Phone 2**, described further in Attachment F-1, contains evidence of the **Subject Offenses**.

vii. **Specifics Regarding Searches of Computer Systems.**

169. Based upon my training and experience, and the training and experience of specially trained computer personnel whom I have consulted, searches of evidence from computers commonly require agents to download or copy information from the computers and their components, or remove most or all computer items (computer hardware, computer software, and computer related documentation) to be processed later by a qualified computer expert in a laboratory or other controlled environment. This is almost always true because of the following:

a. Computer storage devices can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take days or weeks, depending on the volume of data stored, and it would be generally impossible to accomplish this kind of data search on site.

b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of a computer system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even

hidden, erased, compressed, password protected, or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (which may be caused by malicious code or normal activities of an operating system), the controlled environment of a laboratory is essential to its complete and accurate analysis.

170. In order to fully retrieve data from a computer system, the analyst needs all storage media as well as the computer. The analyst needs all the system software (operating systems or interfaces, and hardware drivers) and any applications software which may have been used to create the data (whether stored on hard disk drives or on external media).

171. In order to gain access to data from a computer system and to fully analyze that data, an analyst may need to have access to the following information or equipment: (a) passwords, encryption keys, and other access devices that may be necessary to access the computer equipment; (b) documents or other items demonstrating the presence or absence of computer software that would allow others to control the items, and presence or absence of security software designed to detect such malicious software; (c) documents or other items demonstrating the attachment of other computer hardware or storage media; and (d) counter forensic programs and associated data that are designed to eliminate data.

172. In addition, a computer, its storage devices, peripherals, and Internet connection interface may be instrumentalities of the

crime(s) and are subject to seizure as such if they contain contraband or were used to carry out criminal activity.

**viii. Procedures To Be Followed In Searching
Computers and Electronic Storage Devices.**

173. The warrant sought by this Application will not authorize the "seizure" of computers and related media within the meaning of Rule 41(c) of the Federal Rules of Criminal Procedure. Rather the warrant sought by this Application will authorize the removal of computers and related media so that they may be searched in a secure environment. Where practicable, however, agents will image the computers and related media on-site.

174. With respect to the search of any computers or electronic storage devices seized from the locations identified in Attachment A-1, B-1, C-1, D-1, E-1, and F-1 hereto, the search procedure of electronic data contained in any such computer may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all of the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;

d. opening or reading portions of files in order to determine whether their contents fall within the items to be seized as set forth herein;

e. scanning storage areas to discover data falling within the list of items to be seized as set forth herein, to possibly recover any such recently deleted data, and to search for and recover deliberately hidden files falling within the list of items to be seized; and/or

f. performing key word searches through all storage media to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachments A-2, B-2, C-2, D-2, E-2, and F-2.


g. Any computer systems and electronic storage devices removed from the premises during the search will be returned to the

premises within a reasonable period of time not to exceed 30 days, or unless otherwise ordered by the Court.

IV. CONCLUSION

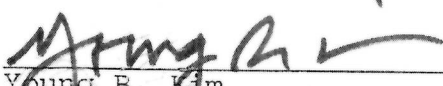
175. Based on the above information, I respectfully submit that there is probable cause to believe that evidence, instrumentalities, and fruits of the **Subject Offenses** are located within the **Subject Premises**. By this affidavit and application, I request that the Court issue a search warrant authorizing the search of the **Subject Premises** for the items described in Attachments A-2, B-2, C-2, D-2, E-2, and F-2.

FURTHER AFFIANT SAYETH NOT.



Steven D. Noldin
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence
this 27th day of May, 2016

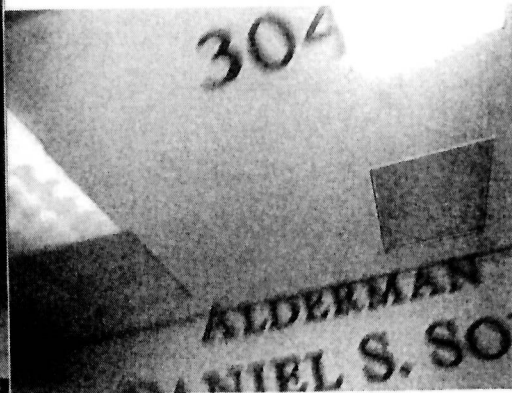
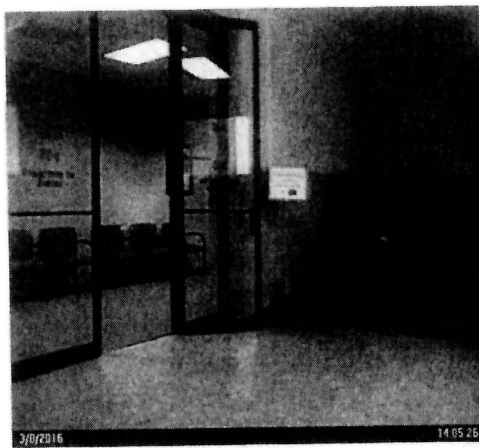


Young B. Kim
United States Magistrate Judge

ATTACHMENT A-1

DESCRIPTION OF PREMISES TO BE SEARCHED

The office located at 121 North LaSalle Street, Room 304, Chicago, Illinois, which is the City Hall office of Alderman DANIEL SOLIS. The office is behind a door that states "Committee on Zoning." The office bears SOLIS's name and office number, 304. The entrance to the office is depicted below:



ATTACHMENT A-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, as follows:

1. Campaign financial records including financial donations, in-kind contributions and expenditure records, reports, ledgers and receipts;
2. Information related to fundraising activities including advertisements, photographs, invitations, letters or records of contributors and/or attendees at fundraising events;
3. Lists, spreadsheets or other records of potential or actual campaign contributors including, but not limited to, contributors with potential matters before the Chicago City Council or a representative body or committee thereof;
4. Calendars, schedules and communications of staff members;
5. Letters and correspondence concerning matters which have appeared or may likely appear before the Chicago City Council or a representative body or committee thereof, including the Zoning Committee, actions Daniel Solis has taken on those matters, as well as benefits received by Daniel Solis from any other party;
6. Credit card statements, bills, payment records/ledgers or receipts;
7. Employee payment records, to include IRS reporting documents such as forms 1099 or W2;

8. Documents concerning occupancy of the **Subject Premises** (described in Attachment A-1), such as utility and telephone bills, mail envelopes, or addressed correspondence; and

9. Computers, electronic devices and removable media storage devices which may contain information related to the above items.

10. With respect to any computer equipment or other electronic devices:

a. Passwords, encryption keys, and other access devices that may be necessary to access the computer equipment.

b. Documents or other items demonstrating the presence or absence of computer software that would allow others to control the items, and presence or absence of security software designed to detect such malicious software.

c. Documents or other items demonstrating the attachment of other computer hardware or storage media.

d. Counter forensic programs and associated data that are designed to eliminate data.

11. Items in the paragraphs above that are stored in computer media, including media capable of being read by a computer (such as external and internal computer hard drives, memory sticks, and thumb drives), and electronic devices that are capable of analyzing, creating, displaying, converting, or transmitting

electronic or magnetic computer impulses or data (such as cellular telephones and PDAs), shall be searched in accordance with the attached Addendum.

ADDENDUM TO ATTACHMENT A-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment A-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment A-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment A-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment A-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment A-2.

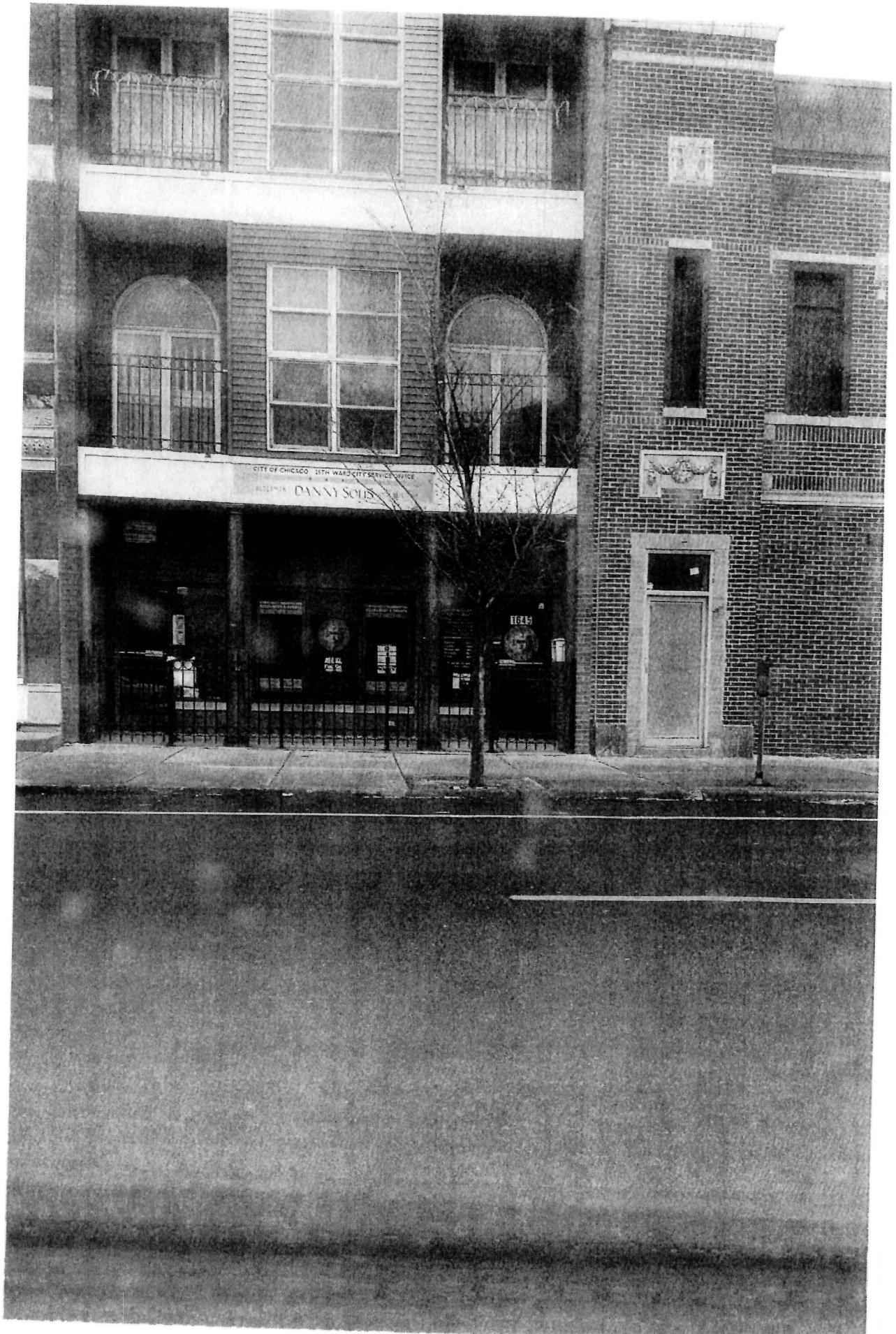
The government will return any electronic storage media removed from the premises described in Attachment A-1 within 30 days of the removal unless, pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, the

removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

ATTACHMENT B-1

DESCRIPTION OF PREMISES TO BE SEARCHED

The office located at 1645 South Blue Island Avenue, Chicago, Illinois, which is the 25th Ward office for Alderman DANIEL SOLIS and the location of Citizens for Danny Solis and the 25th Ward Regular Democratic Organization. The entrance to the office located at 1645 South Blue Island Avenue is depicted in the attached photograph:



ATTACHMENT B-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, as follows:

1. Campaign financial records including financial donations, in-kind contributions and expenditure records, reports, ledgers and receipts;
2. Information related to fundraising activities including advertisements, photographs, invitations, letters or records of contributors and/or attendees at fundraising events;
3. Lists, spreadsheets or other records of potential or actual campaign contributors including, but not limited to, contributors with potential matters before the Chicago City Council or a representative body or committee thereof;
4. Calendars, schedules and communications of staff members;
5. Letters and correspondence concerning matters which have appeared or may likely appear before the Chicago City Council or a representative body or committee thereof, including the Zoning Committee, actions Solis has taken on those matters, as well as benefits received by Daniel Solis from any other party;
6. Credit card statements, bills, payment records/ledgers or receipts;
7. Employee payment records, to include IRS reporting documents such as forms 1099 or W2;

8. Documents concerning occupancy of the Subject Premises (described in Attachment B-1), such as utility and telephone bills, mail envelopes, or addressed correspondence; and
9. Computers, electronic devices and removable media storage devices which may contain information related to the above items.
10. With respect to any computer equipment or other electronic devices:
 - a. Passwords, encryption keys, and other access devices that may be necessary to access the computer equipment.
 - b. Documents or other items demonstrating the presence or absence of computer software that would allow others to control the items, and presence or absence of security software designed to detect such malicious software.
 - c. Documents or other items demonstrating the attachment of other computer hardware or storage media.
 - d. Counter forensic programs and associated data that are designed to eliminate data.
11. Items in the paragraphs above that are stored in computer media, including media capable of being read by a computer (such as external and internal computer hard drives, memory sticks, and thumb drives), and electronic devices that are capable of analyzing, creating, displaying, converting, or transmitting

electronic or magnetic computer impulses or data (such as cellular telephones and PDAs), shall be searched in accordance with the attached Addendum.

ADDENDUM TO ATTACHMENT B-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment B-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment B-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B-2.

The government will return any electronic storage media removed from the premises described in Attachment B-1 within 30 days of the removal unless, pursuant to Rule 41(e)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of the offense or otherwise is material to the Government's case.

ATTACHMENT C-1

DESCRIPTION OF PREMISES TO BE SEARCHED

The apartment located at 800 South Wells Street, Unit 522, Chicago, Illinois. The apartment is located within a multi-unit building known as River City. The residence is located on the "RR" level of River City. And address placard with unit number "522" is affixed to the wall adjacent to the entrance. The entrance to Unit 522 is a solid panel entrance door with a silver colored door knocking device attached.

ATTACHMENT C-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, as follows:

1. Items relating to DANIEL SOLIS's personal finances, loans and expenditures, to include:

- a. Books, records, journals or other records of original entry;
- b. Ledgers and other records of assets, liabilities, or capital account balances;
- c. Records of income or expenses including invoices and receipts;
- d. records of lessors or lessee;
- e. records of receipts or disbursements;
- f. accounting information;
- g. bank statements, check registers, or canceled checks;
- h. duplicate deposit tickets;
- i. bank account reconciliations;
- j. passbooks, certificates of deposit, money orders, or cashier's or official checks;
- k. records of payroll or employee earnings;

- l. records of bartering activity such as exchanges of property or services;
 - m. financial statements or copies of tax returns;
 - n. documents and items concerning economic and other benefits received by Daniel Solis from any other party;
2. Credit card statements, bills, payment records/ledgers or receipts;
3. Documents concerning occupancy of the **Subject Premises** (described in Attachment C-1), such as utility and telephone bills, mail envelopes, or addressed correspondence; and
4. Computers, electronic devices and removable media storage devices which may contain information related to the above items.
5. With respect to any computer equipment or other electronic devices:
 - a. Passwords, encryption keys, and other access devices that may be necessary to access the computer equipment.
 - b. Documents or other items demonstrating the presence or absence of computer software that would allow others to control the items, and presence or absence of security software designed to detect such malicious software.
 - c. Documents or other items demonstrating the attachment of other computer hardware or storage media.

d. Counter forensic programs and associated data that are designed to eliminate data.

6. Items in the paragraphs above that are stored in computer media, including media capable of being read by a computer (such as external and internal computer hard drives, memory sticks, and thumb drives), and electronic devices that are capable of analyzing, creating, displaying, converting, or transmitting electronic or magnetic computer impulses or data (such as cellular telephones and PDAs), shall be searched in accordance with the attached Addendum.

ADDENDUM TO ATTACHMENT C-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment C-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment C-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment C-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment C-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment C-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment C-2.

The government will return any electronic storage media removed from the premises described in Attachment C-2 within 30 days of the removal unless, pursuant to Rule 41(e)(2) or (3) of the Federal Rules of Criminal Procedure, the

removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

ATTACHMENT D-1

DESCRIPTION OF PREMISES TO BE SEARCHED

The apartment located at 1135 South Delano Court, Unit 812 East, Chicago, Illinois. The apartment is located within a multi-unit apartment complex known as The Roosevelt Collection. As shown below, the number "812E" is shown next to the entrance to the Subject Premises.



ATTACHMENT D-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, as follows:

1. Items relating to DANIEL SOLIS's personal finances, loans and expenditures, to include:

- a. Books, records, journals or other records of original entry;
- b. Ledgers and other records of assets, liabilities, or capital account balances;
- c. Records of income or expenses including invoices and receipts;
- d. records of lessors or lessee;
- e. records of receipts or disbursements;
- f. accounting information, including trial balances or work sheets adjusting, reclassifying, closing, or reversing entries;
- g. bank statements, check registers, or canceled checks;
- h. duplicate deposit tickets;
- i. bank account reconciliations;
- j. passbooks, certificates of deposit, money orders, or cashier's or official checks;
- k. records of payroll or employee earnings;

- l. records of bartering activity such as exchanges of property or services;
 - m. financial statements or copies of tax returns;
 - n. documents and items concerning economic and other benefits received by Daniel Solis from any other party;
2. Credit card statements, bills, payment records/ledgers or receipts;
3. Documents concerning occupancy of the **Subject Premises** (described in Attachment D-1), such as utility and telephone bills, mail envelopes, or addressed correspondence; and
4. Computers, electronic devices and removable media storage devices which may contain information related to the above items.
5. With respect to any computer equipment or other electronic devices:
 - a. Passwords, encryption keys, and other access devices that may be necessary to access the computer equipment.
 - b. Documents or other items demonstrating the presence or absence of computer software that would allow others to control the items, and presence or absence of security software designed to detect such malicious software.
 - c. Documents or other items demonstrating the attachment of other computer hardware or storage media.

d. Counter forensic programs and associated data that are designed to eliminate data.

6. Items in the paragraphs above that are stored in computer media, including media capable of being read by a computer (such as external and internal computer hard drives, memory sticks, and thumb drives), and electronic devices that are capable of analyzing, creating, displaying, converting, or transmitting electronic or magnetic computer impulses or data (such as cellular telephones and PDAs), shall be searched in accordance with the attached Addendum.

ADDENDUM TO ATTACHMENT D-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment D-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment D-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment D-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment D-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment D-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment D-2.

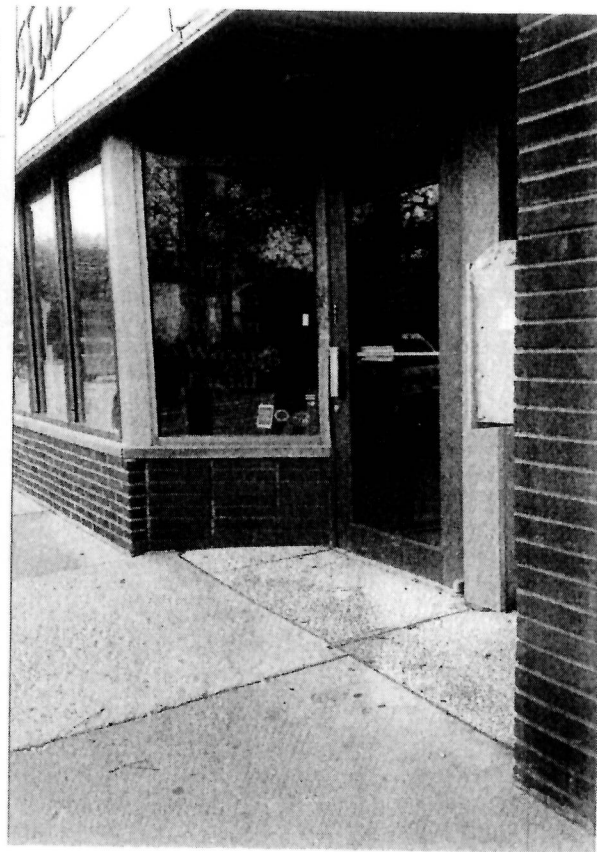
The government will return any electronic storage media removed from the premises described in Attachment D-2 within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the

removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

ATTACHMENT E-1

DESCRIPTION OF PREMISES TO BE SEARCHED

The business known as "Copper Tan and Spa," located at 1052 N. Milwaukee Avenue, Chicago, Illinois, is located on the first floor of a two-story building. As shown below, the sign "Copper Tan & Spa" hangs over the first floor of the building. Neon lights reading "Open," "Massage," and "Facial" hang in the front window of the business. The number "1052" appears over the entrance to the business.



ATTACHMENT E-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, namely, items evidencing visits to the **Subject Premises** (as defined in Attachment E-1) by Daniel Solis and his companions (to include Roberto Caldero), to include the following items:

1. Video surveillance equipment and recordings;
2. Financial records, including receipts, checks, bank and savings and loan records of deposit, statements and other bank records, credit card statements, money orders, cashier's checks, passbooks, cancelled checks, certificates of deposit, loan records, customer account information, and income and expense summaries.
3. Appointment books, calendars, client lists, details of services rendered, the names of masseuses that a client utilizes, and other records of client visits, services rendered and contact information; and
4. Computers, electronic devices and removable media storage devices which may contain information related to the above items.

ADDENDUM TO ATTACHMENT E-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment E-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment E-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment E-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment E-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment E-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment E-2.

The government will return any electronic storage media removed from the premises described in Attachment E-2 within 30 days of the removal unless, pursuant to Rule 41(e)(2) or (3) of the Federal Rules of Criminal Procedure, the

removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.

ATTACHMENT F-1

DESCRIPTION OF PROPERTY TO BE SEARCHED

The cellular telephone bearing the number (312) 208-0292, International Mobile Subscriber Identity Number ("IMSI") 310410840352309, a cellular telephone on the system operated by the service provider AT&T, subscribed to "Daniel Solis, 6148 Rob Roy Dr., Oak Forest, IL 60452."

ATTACHMENT F-2

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 371, 666, 1343, 1346, 1349, and 1951, as follows:

1. Items indicating use or control of the cell phone, including contacts lists, instant messaging logs, call history, and communications (and the data associated with the foregoing, such as date and time);

2. Communications, including voicemails and text messages, relating to the Subject Offenses as described in the affidavit of Special Agent Steven Noldin submitted in support of the application for search warrant, including communications, voicemails and text messages concerning the following:

a. campaign financial records including financial donations, in-kind contributions and expenditure records, reports, ledgers and receipts;

b. information related to fundraising activities including advertisements, photographs, invitations, letters or records of contributors and/or attendees at fundraising events;

c. lists, spreadsheets or other records of potential or actual campaign contributors including, but not limited to, contributors with potential matters before the Chicago City Council or a representative body or committee thereof;

i. calendars, schedules and communications of staff members;

e. communications concerning matters which have appeared or may likely appear before the Chicago City Council or a representative body or committee thereof, including the Zoning Committee, as well as benefits received by Daniel Solis from any other party;

f. credit card statements, bills, payment records/ledgers or receipts;

g. employee payment records, to include IRS reporting documents such as forms 1099 or W2;

3. Digital photographs of co-conspirators or relating to the Subject Offenses as described in the affidavit of Special Agent Steven Noldin submitted in support of the application for search warrant; and

4. Items indicating the geographic location of the cell phone and user at a particular time (e.g., location integrated into an image or video sent via email or text message to include both metadata and the physical location displayed in an image or video).

ADDENDUM TO ATTACHMENT F-2

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment F-1 so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment F-1 may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment F-2;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment F-2 (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment F-2; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment F-2.

The government will return any electronic storage media removed from the premises described in Attachment F-2 within 30 days of the removal unless, pursuant to Rule 41(e)(2) or (5) of the Federal Rules of Criminal Procedure, the

removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.